



THE SECRETARY OF THE INTERIOR
WASHINGTON

NOV 12 2002

The Honorable Cyrus Schindler
Nation President
Seneca Nation of Indians
Route 438
Irving, New York 14081

Dear President Schindler:

We have completed our review of the Tribal-State Gaming Compact (Compact) for the conduct of Class III gaming activities between the Seneca Nation of Indians (Nation) and the State of New York (State), executed on August 18, 2002, and received by the Department on September 10, 2002. Generally, the Compact authorizes the Tribe to conduct Class III gaming at three sites: an identified area within the City of Niagara Falls, or an alternative site within the County of Niagara; an unidentified area within the County of Erie or the City of Buffalo; and an on-reservation site. The Compact requires that the Tribe pay the State a percentage of the Tribe's gaming revenue in exchange for several benefits including an exclusive 10,500 square-mile area in Western New York and start-up benefits, provided by the State. The Tribe agrees to purchase the gaming sites with funds from the Seneca Nation Settlement Act of 1990, 25 U.S.C. § 1774 (Settlement Act) reserving five million dollars for housing adjacent to the gaming sites.

Under the Indian Gaming Regulatory Act (IGRA), 25 U.S.C. § 2710(d)(8)(C), the Secretary may approve or disapprove the Compact within forty-five days of its submission. If the Secretary does not approve or disapprove the Compact within forty-five days, IGRA states that the Compact is considered to have been approved by the Secretary, "but only to the extent the compact is consistent with the provisions of [IGRA]." Under IGRA the Department must determine whether the Compact violates IGRA, any other provision of Federal law that does not relate to jurisdiction over gaming on Indian lands, or the trust obligations of the United States to Indians.

As part of the Department's review of the Compact, on September 30, 2002, we sent a letter to the parties seeking clarification of various provisions of the Compact. The responses we received from the State and the Nation have resolved most of our questions, as well as resolving some additional issues raised by non-compacting parties. We have also held several meetings and conference calls with the parties to discuss the Compact and our concerns.

I have decided to allow this Compact to take effect without Secretarial action. I use this approach reluctantly. In enacting IGRA, Congress provided limited reasons for Secretarial approval or disapproval. However, because I want to express my views on important policy

concerns regarding the Compact, concerns that fall outside of the limited reasons in IGRA for Secretarial disapproval, I must avail myself of the opportunity to do so. I believe the State and Nation negotiated in good faith, however, I could not affirmatively approve the Compact because of the effect it is likely to have on future compacts.¹

General Observations

Since taking office, I have had the opportunity to review and decide a number of Indian gaming-related matters. I do not have the luxury of reviewing any compact without considering the trends that will emerge with each successive compact. As I have reviewed this and previous compacts, my concerns regarding IGRA and the interplay with other aspects of Indian policy have become sufficient to warrant this explanation.

I fully support Indian gaming as envisioned by the drafters of IGRA - that Indian tribes should have the full economic opportunity of gaming within the boundaries of reservations existing at the time of IGRA's passage. But I am also mindful that when tribes seek to game on off-reservation land, the State has a greater governmental interest in regulating tribal off-reservation gaming activities. Tribes are increasingly seeking to develop gaming facilities in areas far from their reservations, focusing on selecting a location based on market potential rather than exercising governmental jurisdiction on existing Indian lands. It is understandable that tribes who are geographically isolated may desire to look beyond the boundaries of their reservation to take advantage of the economic opportunities of Indian gaming. However, I believe that IGRA does not envision that off-reservation gaming would become pervasive.

Even with this concern in mind, I have concluded that this Compact appropriately permits gaming on the subject lands because Congress has expressly provided for the Nation to acquire certain lands pursuant to the Settlement Act. I am nevertheless concerned that elements of this Compact may be used by future parties to proliferate off-reservation gaming development on lands not identified as part of a Congressional settlement but instead on lands selected solely based on economic potential, wholly devoid of any other legitimate connection. Thus, to the extent that other states and tribes model future compacts after this one, and seek to have the United States take land into trust for these gaming ventures, they should understand that my

¹ It seems to me that the Department and compacting parties could work more closely on an informal basis to improve the compact development and review process. While I do not want to intrude into the parties' arms-length negotiations, I am concerned that the Department receives a compact that is a fait accompli without much opportunity for the Department to express its policy views, except as part of the 45-day review process. Thus, as the process currently works, compacting parties have only the guidance of previous compacts as a starting point for the parameters of their negotiations. I believe that the process would be enhanced if both parties availed themselves of the Department's informal guidance prior to the delivery of their finalized compact to my desk for review. At times, parties have been able to make changes during the 45-day review process, however, the parties here informed the Department that it would be impossible to make changes to this Compact within the review period. Departmental input, prior to the compact being submitted, might have been extremely helpful here.

views regarding land acquired through a Congressional settlement are somewhat different from my views when a tribe is seeking a discretionary off-reservation trust acquisition or a two-part determination under IGRA. While I do not intend to signal an absolute bar on off-reservation gaming, I am extremely concerned that the principles underlying the enactment of IGRA are being stretched in ways Congress never imagined when enacting IGRA.

Revenue Sharing and Geographic Exclusivity

Section 12(a) of the Compact grants the Nation the exclusive right to operate specifically defined gaming devices within a 10,500 square-mile, geographic area in Western New York.² In exchange for this geographic exclusivity right, Section 12 requires the Nation to make graduated revenue-sharing payments to the State (from 18% to 25% of net drop, less a local share) over the course of the 14-year duration of the Compact. If the State violates the exclusivity provision in Section 12(a)(1), the payment to the State ceases as to the particular category of gaming device for which exclusivity no longer exists. If the State violates the exclusivity provision in Section 12(a)(2), the payment to the State ceases altogether.³

The Department has sharply limited the circumstances under which Indian tribes can make direct payments to a state for purposes other than defraying the costs of regulating Class III gaming activities. To date, the Department has approved payments to a state only when the state has agreed to provide the tribe with substantial exclusivity for Indian gaming *i.e.*, where a compact provides a tribe with substantial economic benefits in the form of a right to conduct Class III gaming activities that are on more favorable terms than any rights of non-Indians to conduct similar gaming activities in the state. The payment to the state must be appropriate in light of the exclusivity right conferred on the tribe.

The Nation and the State have advanced arguments that the geographic exclusivity defined in Section 12(a)(1) of the Compact is substantial and meaningful, pointing out that this zone of exclusivity is a 10,500 square-mile area in Western New York that, based on professional analysis of the market from which the Nation's gaming facility would draw, includes primary (up to 50 miles), secondary (51-99 miles), and tertiary (100-150 miles) customer markets for any

² Section 12(a)(1) of the Compact provides the following description of the geographic area: "(i) to the east, State Route 14 from Sodus Point to the Pennsylvania border with New York; (ii) to the north, the border between New York and Canada; (iii) to the south, the Pennsylvania border with New York; (iv) to the west, the border between Pennsylvania and New York."

³The Department asked if the Nation's exclusive right to operate slot machines within the zone of exclusivity was lost and the Nation therefore ceased making revenue payments, whether it would violate the provision of New York law permitting the possession of slot machines only pursuant to a gaming compact where the State receives a negotiated percentage of the net drop. The State has argued that by negotiating this Compact with the Nation that includes the receipt of a negotiated percentage of the net drop, it has met its obligation under the law, even if revenue payments decline to zero. We concur with the State's interpretation of the meaning of its law and conclude that the State has met its legal obligation.

established Buffalo and Niagara Falls gaming facility. According to the economic analysis provided by the Nation, the total revenues currently anticipated from the gaming operations over the term of the Compact, exceed five billion dollars, of which the State would receive less than one billion dollars, and a portion of those State funds would go to local governments. The Nation estimates its anticipated return after all expenses to significantly exceed two billion dollars over the fourteen-year term of the Compact.

The Nation argues that exclusivity in a gaming market of this size is extremely valuable and justifies on its own the average seventeen percent revenue share that the State will receive under the Compact after the local payment. However, the Nation and the State argue that the State is also providing the Nation with other substantial benefits in exchange for the revenue share. Section 11 of the Compact commits the State to transfer the Niagara Falls Convention Center for the sum of one dollar, which will enable the Nation to realize substantial savings, approximately forty million dollars, on otherwise significant development and start-up costs. Other forms of State assistance that the Nation bargained for and obtained are the State's agreement to use its sovereign power of eminent domain to acquire other parcels of land required for the project. Finally, Section 11 of the Compact secures for the Nation the opportunity to operate two off-reservation gaming facilities within the populous and well-visited geographic markets of Buffalo and Niagara Falls.

While I believe that the Nation is receiving a substantial economic benefit that justifies the revenue sharing, I am very troubled that the parties have chosen to exclude other tribes within the area of geographic exclusivity. The Compact creates two areas of exclusivity - one the entire Western portion of New York and another a twenty-five-mile radius of any gaming facility authorized under this Compact. Those provisions support my conclusion that the revenue sharing is justified. However, the drafters of this Compact have excluded Indian gaming from most of the area of exclusivity. The choice to specifically deny other tribes gaming opportunities is the primary reason I have chosen not to affirmatively approve this Compact.

It is worth noting, however, that the Compact does create an exception for two non-compacting tribes, the Tuscarora Indian Nation and the Tonawanda Band of Seneca Indians, in both of these areas of exclusivity. Without violating the terms of the Compact, the State may negotiate with these Tribes to establish a gaming facility either on federally-recognized Indian lands existing on the effective date of this Compact or outside of the twenty-five-mile radius within Western New York.

The Tonawanda Band and the Tuscarora Nation have notified us that they strongly object to approval of the Compact because, in their view, it violates the trust obligation of the United States to the two Nations by including provisions that explicitly restrict the economic opportunities that would otherwise be available to them under federal law, without their consent. There is no question that in approving the Compact, the Department would essentially ratify an agreement that has the effect of restricting the economic opportunities of the Tonawanda Band and the Tuscarora Nation because the State has a strong incentive not to permit these two Nations

to conduct gaming off-reservation within the twenty-five mile (exclusivity) radius, to avoid losing revenue-sharing payments to which it is otherwise entitled from the Nation.

I have reviewed whether this provision violates our trust obligation to Indians, and I conclude that it does not. Under the terms of the Compact, the State does not violate the exclusivity provision of the Compact if the Tonawanda Band and the Tuscarora Nation game on existing federally-recognized Indian lands. Thus, there is no disincentive to the State to negotiate for on-reservation gaming activities. The remaining question is, therefore, whether any tribe enjoys a legal right to off-reservation gaming under IGRA. I believe that Congress in enacting IGRA, struck a delicate balance between State and tribal interests that did not create an absolute right to off-reservation gaming.

Even though this provision does not violate my trust obligation to Indians, I am still troubled that parties in future compacts may pit tribe against tribe. While I believe that it was unintentional here, especially because both the Tonawanda Band and the Tuscarora Nation are regarded as traditionally opposed to gaming, I do not welcome the prospect of future compacts pitting tribes against one another. While I understand that the State is required to negotiate in good-faith with all Indian tribes and it has assured us that it understands its obligation under law I still find a provision excluding other Indian gaming anathema to basic notions of fairness in competition and, if pushed to its extreme by future compacts, inconsistent with the goals of IGRA.⁴

To summarize, this Compact provides for substantial geographic exclusivity coupled with other valuable consideration. It is for this reason that I believe this revenue-sharing arrangement is consistent with IGRA.

Lands Acquired through the Seneca Nation Settlement Act

Subsections 11(b)(4) and (c) of the Compact provide for the use of settlement funds derived from the Seneca Nation Settlement Act of 1990, 25 U.S.C. § 1774 (Settlement Act) to "acquire the parcels in the City of Niagara Falls and the City of Buffalo" for the purpose of gaming. Under the terms of the Settlement Act, the Nation may use settlement funds to acquire "land within the aboriginal area in State or situated within or near proximity to former reservations lands." The Settlement Act also provides that unless the Secretary determines that lands acquired pursuant to the Act should not be subject to 25 U.S.C. § 177, such lands shall be held in "restricted fee" as opposed to being held in trust by the United States.

In reviewing whether the proposed gaming parcels meet the Settlement Act's requirement that the lands are "situated within or near proximity to former reservations lands," the Nation has

⁴ Moreover, notwithstanding this or any other provision of this Compact, the Department will continue to entertain any Section 20 two-part determination applications submitted by an Indian tribe within the State of New York pursuant to IGRA.

provided sufficient documentation demonstrating that the exterior boundaries of the Nation's former Buffalo Creek Reservation overlap a portion of the present day boundary of the City of Buffalo and is within fourteen miles of the City of Niagara Falls exterior boundary. Moreover, the exterior boundary of the Nation's former Tonawanda Reservation is within fourteen miles of the City of Buffalo and within twenty-two miles of the City of Niagara Falls. While the Settlement Act does not define "within or near proximity" and there is no legislative history for for guidance, it is our opinion that the two cities of Niagara Falls and Buffalo are "situated within or near proximity to "the Nation's former Buffalo Creek and Tonawanda reservations for purposes of the Settlement Act.

I want to emphasize, however, that the analysis regarding off-reservation land as part of a Congressionally-approved settlement greatly differs from the analysis the Department engages in when the issue is simply a trust acquisition for off-reservation gaming. Here, Congress tied the acquisition of lands through the Settlement Act to lands in "near proximity" to the Nation's former reservation. This decision rests squarely on a Congressionally-approved settlement of a land claim. Consequently, my analysis of "within or near proximity" should be understood as limited to the interpretation of the Settlement Act alone.

Indian Lands under IGRA

IGRA permits a tribe to conduct gaming activities on Indian lands if the tribe has jurisdiction over those lands, and only if the tribe uses that jurisdiction to exercise governmental power over the lands. There is no question that the Settlement Act requires the parcels to be placed in "restricted fee" status. As such, these parcels will come within the definition of "Indian lands" in IGRA if the Nation exercises governmental power over them. The Department assumes that the Nation will exercise governmental powers over these lands when they are acquired in restricted fee. It is our opinion that the Nation will have jurisdiction over these parcels because they meet the definition of "Indian country" under 18 U.S.C. § 1151. Historically, Indian country is land that, generally speaking, is subject to the primary jurisdiction of the Federal Government and the tribe inhabiting it. As interpreted by the courts, Indian country includes lands which have been set aside by the Federal Government for the use of Indians and subject to federal superintendence. In this regard, it is clear that lands placed in restricted status under the Settlement Act are set aside for the use of the Nation, and that such restricted status contemplated federal superintendence over these lands. Finally, the Settlement Act authorizes lands held in restricted status to expand the Nations reservation boundaries, or become part of the Nation's reservation. Accordingly, we believe that the Settlement Act contemplates that lands placed in restricted status be held in the same legal manner as existing Nation's lands are held and thus, subject to the Nation's jurisdiction.

Application of Section 20 of IGRA

Section 20 of IGRA, 25 U.S.C. § 2719 contains a general prohibition on gaming on lands acquired in trust by the Secretary for the benefit of an Indian tribe after October 17, 1988, unless

one of several statutory exceptions is applicable to the land. Under the Compact, the Nation plans to use the provisions of the Settlement Act to acquire the land in restricted fee, rather than in trust. The Department has examined whether Section 20 of IGRA applies to the Compact. We have reviewed whether Congress intended, by using the words "in trust" in Section 20 of IGRA, to completely prohibit gaming on lands acquired in restricted fee status by an Indian tribe after October 17, 1988. I cannot conclude that Congress intended to limit the restriction to gaming on after-acquired land to only *per se* trust acquisitions. The Settlement Act clearly contemplates the acquisition of Indian lands which would otherwise constitute after-acquired lands. To conclude otherwise would arguably create unintended exceptions to the Section 20 prohibitions and undermine the regulatory regime prescribed by IGRA. I believe that lands held in restricted fee status pursuant to an Act of Congress such as is presented within this Compact must be subject to the requirements of Section 20 of IGRA.

The legislative history to the Settlement Act makes clear that one of its purposes was to settle some of the Nation's land claim issues. Thus, the Nation's parcels to be acquired pursuant to the Compact and the Settlement Act will be exempt from the prohibition on gaming contained in Section 20 because they are lands acquired as part of the settlement of a land claim, and thus fall within the exception in 25 U.S.C. § 2719(b)(1)(B)(i).

Use of Remaining Settlement Act Funds for Housing

Section 11(c) of the Compact provides for the "acquisition of parcels to meet the housing needs of the Nation's members." IGRA provides that a gaming compact will govern gaming activities on Indian lands of the Indian tribe and "may include provisions relating to ... any other subjects that are directly related to the operation of gaming activities." It has been the policy of the Department that a Class III gaming compact can only include provisions that are "directly related" to the operation of gaming activities, and cannot include provisions that are not germane to gaming activities. The Department has taken this position because it represents a common sense approach to the interpretation of IGRA.

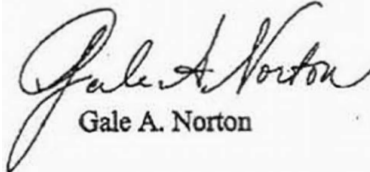
In response to our inquiry, the Nation has advised us that land acquired for housing under Section 11(c) of the Compact is directly related to the operation of gaming activities because the primary purpose in acquiring such parcels is to provide housing for tribal members next to the Nation's gaming facilities. However, because Section 11(c) of the Compact does not require any relation to the gaming activities, we believe that the Nation's argument that this provision is directly related to gaming is tenuous and strains the directly related criterion required by IGRA.

Conclusion

In conclusion, while I believe that the Nation and the State worked hard to negotiate a Compact that met the parties' immediate needs, I believe the policy considerations outlined above counsel against an affirmative approval. Since I did not approve or disapprove the Compact within 45 days, the Compact is considered to have been approved, "but only to the

extent the compact is consistent with the provisions of [IGRA].” The Compact takes effect when notice is published in the *Federal Register* pursuant to Section 11(d)(3)(B) of IGRA, 25 U.S.C. § 22710(d)(3)(B).

Sincerely,



Gale A. Norton

Identical letter sent to:
The Honorable George E. Pataki

NATION-STATE
GAMING COMPACT
BETWEEN THE
SENECA NATION OF
INDIANS AND THE
STATE OF NEW YORK

Volume I

NATION-STATE GAMING COMPACT
BETWEEN THE
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AND THE
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NATION-STATE GAMING COMPACT
BETWEEN THE
SENECA NATION OF INDIANS
AND THE
STATE OF NEW YORK

This Compact is made and entered into between the Seneca Nation of Indians, a sovereign Indian nation ("Nation") and the State of New York ("State") pursuant to the provisions of the Indian Gaming Regulatory Act, 25 U.S.C. §§ 2701 *et seq.* ("IGRA").

WHEREAS, the Nation is a sovereign Indian nation recognized by the United States of America, possessing all sovereign rights and powers pertaining thereto; and

WHEREAS, the State is a state of the United States of America, possessing all sovereign rights and powers pertaining thereto.

NOW, THEREFORE, the NATION and the STATE, consistent with the Memorandum of Understanding between the State Governor and the President of the Seneca Nation of Indians executed on June 20th 2001, and in consideration of the undertakings and agreements hereinafter set forth, hereby enter into this Class III Gaming Compact.

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1. **DEFINITIONS.**

For purposes of this Compact, including the Appendices:

- (a) "Appendix" means an appendix to this Compact, all of which are incorporated by reference herein. "Appendices" means more than one Appendix.
- (b) "Certified Mail" means certified or registered mail, Federal Express, United Parcel Service, Express Mail or any similar mail delivery service generating a return receipt or a signature of the recipient, confirming delivery of that mail. Certified Mail does not include electronic mail.
- (c) "Class III Gaming" has the meaning ascribed to such term in 25 U.S.C. §2703(8).
- (d) "Class III Gaming Employee" means an individual employee of the Nation Gaming Operation who renders Class III Gaming-related employee services in a Nation Gaming Facility.
- (e) "Class III Gaming Employee License" means a license issued by the SGA to a Class III Gaming Employee pursuant to the procedures set forth in Appendix C.
- (f) "Class III Gaming Key Employee" means a natural person employed by the Nation Gaming Operation in a supervisory capacity empowered to make discretionary decisions that affect gaming operations as determined by the SGA.

- (g) "Class III Gaming Service Enterprise" means an entity or individual, other than a Class III Gaming Employee, that provides Class III Gaming services, Class III Gaming supplies or Class III Gaming equipment to a Nation Gaming Facility.
- (h) "Class III Gaming Service Enterprise License" means a license issued by the SGA to a Class III Gaming Service Enterprise pursuant to the procedures set forth in Appendix D.
- (i) "Class III Non-Gaming Employee" means an individual employee of the Nation Gaming Operation working in a Gaming Facility who is not a Class III Gaming Employee.
- (j) "Class III Non-Gaming Employee License" means a license issued by the SGA to a Class III Gaming Employee pursuant to the procedures set forth in Appendix C.
- (k) "Compact" means this Nation-State Gaming Compact between the Nation and the State and all Appendices attached hereto.
- (l) "Effective Date" has the meaning set forth in Paragraph 4(a).
- (m) "Gaming Device" means two categories of gaming devices:
 - (i) 'slot machines' as that term is defined in Section 9(a) of Appendix A; and,
 - (ii) 'video lottery games' as that term is defined in Section 9(a) of Appendix A.
- (n) "Gaming Facility" means those portions of a structure in

which the Nation conducts Class III Gaming pursuant to this Compact. For purposes of this definition, a Gaming Facility shall be deemed to include only those areas of a structure that the Nation uses for Class III Gaming operations. Notwithstanding the foregoing, no areas of a structure exclusively used for Class I or Class II gaming or for non-gaming activities shall be considered part of a Gaming Facility.

- (o) "Immediate Family Member" means the spouse, parent, or child of a person, or a parent or child of the spouse of that person.
- (p) "Licensing Review Commission" means the entity established to implement the appeal procedures set forth in Appendices C-E.
- (q) "Material Breach" means a material, uncured breach of this Compact.
- (r) "MOU" means the Memorandum of Understanding between the State Governor and the President of the Seneca Nation of Indians executed on June 20, 2001, incorporated by reference herein.
- (s) "Nation" means the Seneca Nation of Indians, its authorized officials, agents or representatives acting in their official capacities.
- (t) "Nation Gaming Operation" means the enterprise, business or entity operated or authorized by the Nation to operate or conduct any form of Class III Gaming on Nation lands

pursuant to this Compact; provided, however, that this Compact shall apply to operations of such enterprise, business or activity only to the extent that such operations are directly related to Class III Gaming undertaken by the Nation pursuant to this Compact.

- (u) "Nation Law Enforcement Agency" means the agency of the Nation established and maintained by the Nation pursuant to the Nation's sovereign powers to carry out law enforcement within the lands of the Nation.
- (v) "Non-Class III Gaming Registration" means a registration issued by the SGA to an enterprise or other person pursuant to the procedures set forth in Appendix E.
- (w) "Paragraph" means a numbered paragraph of this Compact.
- (x) "Party" means either the Nation or the State.
- (y) "Parties" means the Nation and the State.
- (z) "Seneca Gaming Authority" or "SGA" means the entity established by the Nation responsible for regulating Class III Gaming undertaken by the Nation pursuant to this Compact.
- (aa) "State" means the State of New York, acting through the Governor as chief executive officer and such other officials, agents or representatives that he or she has duly authorized, acting in their official capacities.
- (bb) "State Gaming Officials" or "SGO" means the officials

designated by the State to fulfill the State's responsibility to ensure Nation Gaming Operation and SGA compliance with the terms of this Compact.

(cc) "State Contribution" has the meaning set forth in Paragraph 12(b)(i).

2. **NO NON-GAMING RELATED ISSUES.**

Nothing in this Compact affects any matter not specifically addressed herein.

3. **AUTHORIZED CLASS III GAMING.**

The Nation shall conduct only those Class III Gaming games specifically listed in Appendix A, in accordance with the specifications set forth in Appendices A and B.

4. TERM OF COMPACT.

- (a) Effective Date. This Compact shall be effective after publication of notice of approval by the Secretary of the Interior of the United States in the Federal Register in accordance with 25 U.S.C. §2710(d)(3)(B), provided that the Compact has been executed and certified by the Governor of the State and by the Nation pursuant to a referendum vote authorizing such execution ("Effective Date").
- (b) Termination Date. This Compact shall terminate on the fourteenth (14th) anniversary of the Effective Date, unless renewed pursuant to Paragraph 4(c) or terminated pursuant to Paragraph 4(d).
- (c) Renewals.
 - (1) Unless either Party objects in writing delivered to the other Party no later than one hundred twenty (120) days prior to the expiration of the fourteen (14)-year term established pursuant to Paragraph 4(b), the term of this Compact shall be renewed automatically for an additional period of seven (7) years.
 - (2) In the event either Party does timely object to the automatic renewal of the term of this Compact, the Parties shall meet promptly following the receipt of such written objection and use their best efforts to address the objecting Party's concerns through frequent and regular good faith

negotiations. In the event the objecting Party's concerns cannot be resolved within a period of one hundred twenty (120) days following the commencement of such negotiations, the Party may submit only the issue of the other Party's good faith in the renewal negotiations to the Party Dispute Resolution provisions set forth in Paragraph 14; provided, however, that during the pendency of dispute resolution, the terms of this Compact shall remain in effect.

(d) Early Termination.

(1) Either Party may terminate this Compact at any time if any of the following occurs:

- a. The IGRA is repealed;
- b. The Nation adopts a referendum revoking the Nation's authority to conduct Class III Gaming; or,
- c. The other Party commits a Material Breach.

(2) To effectuate an elective termination pursuant to this subparagraph, the terminating Party shall serve notice of such termination upon the other Party in accordance with Paragraph 17(c), which notice shall be effective no earlier than six (6) months following the date on which the other Party receives such notice.

5. **NATION REGULATORY AUTHORITY**

- (a) General Responsibility. The SGA shall have responsibility for the on-site regulation of Class III Gaming undertaken by the Nation pursuant to this Compact. The SGA's authority and responsibility shall be as set forth in this Compact and its Appendices.
- (b) Specific Elements of SGA's Regulatory Responsibilities. The Nation shall ensure that the SGA regulates the Class III Gaming undertaken by the Nation pursuant to this Compact in a manner that ensures compliance with the provisions set forth in Appendix J.
- (c) Inspectors. SGA shall employ inspectors who shall be present in all Gaming Facilities during all hours of operation and who shall be under the authority of the SGA and not the Nation Gaming Operation.
- (d) Access. Such inspectors shall be afforded access to all areas of the Gaming Facilities during all hours of operation without notice.
- (e) Investigations. SGA inspectors shall have authority to investigate any matter relating to the regulation of the Nation's Class III Gaming operations pursuant to this Compact.
- (f) Provision of Reports; Process and Resolution of Disputes. The SGA shall cooperate with the SGO and shall make immediately available to the SGO all patron complaints, incident reports, gaming violations, surveillance logs,

and security reports. If a report indicates that a complaint, violation or incident has not been resolved, the report shall state what remedial steps have been or will be taken to resolve the matter. A follow-up report shall indicate the final disposition of the matter. If the SGO believes that the action or inaction taken by the SGA violates the provisions of this Compact or its Appendices, the Parties shall meet to settle the matter. If the Parties cannot agree, the Nation or the State may initiate the Party Dispute Resolution procedure set forth in Paragraph 14.

- (g) Fines. The SGA shall be empowered by Nation regulation to impose fines and other appropriate sanctions on the Nation Gaming Operation and its employees, licensees and vendors within the jurisdiction of the Nation for violations of this Compact and its Appendices. The SGA shall immediately notify the State, in writing of any fine or sanction imposed pursuant to this subparagraph.

- (h) Restriction on SGA. All SGA employees and officials, and Immediate Family Members of such employees and officials, shall have no financial interest in Class III Gaming undertaken by the Nation pursuant to this Compact, other than an interest that accrues solely by virtue of Nation citizenship. No SGA employee or official shall be employed by a person or entity required to be licensed pursuant to this Compact. This provision shall be in addition to, not in derogation of, any applicable Nation law regarding conflicts of interest.

- (i) Identification Badges. The SGA shall issue color-coded

identification badges to all SGO and other State personnel working at a Gaming Facility, which badges shall be worn by the SGO and other State personnel at all times when on the premises of the Gaming Facility. Such badges shall remain the property of SGA and must be returned at the conclusion of the official's work at the Gaming Facility.

6. **STATE RESPONSIBILITY.**

- (a) Generally. The SGO shall have responsibility to ensure Nation compliance with the terms of this Compact.
- (b) Officials. Those officials designated by the State to fulfill the role set forth in Paragraph 6(a) above shall collectively be known as the "SGO".
- (c) Access. For purposes of fulfilling its responsibilities as set forth in Paragraph 6(a), SGO shall be afforded immediate, unfettered access to all areas of the Gaming Facilities during all hours of operation without notice. SGO shall be afforded full access to areas of the Gaming Facilities in which money is counted or kept only when accompanied by SGA personnel, or when SGA otherwise provides permission. The State shall not cause to be present at the Gaming Facilities more employees than are reasonably necessary to carry out its responsibilities under Paragraph 6(a).
- (d) Notice of violations. The State shall promptly notify the Nation and the SGA of any alleged violations of this Compact with sufficient detail to allow the SGA to investigate and if necessary rectify the alleged violation.
- (e) Conduct of State personnel. SGO shall take all reasonable measures to avoid interfering with the conduct of Class III Gaming and related activities and operations of the Nation Gaming Operation.

- (f) Records Access. In fulfilling the State role under this Compact, SGO may request, and the SGA shall promptly provide during hours of operation, access to business and accounting records of its Class III Gaming activities; provided, however, that all records to which SGA provides access to SGO pursuant to this Paragraph 6(f) shall be subject to the provisions of Paragraph 15 (Confidentiality).
- (g) Investigations. The SGO shall have the authority to investigate any alleged violations of this Compact. The SGA and the Nation Gaming Operation shall cooperate with the SGO in such investigations.
- (h) Quarterly meetings. Representatives of SGA, the Nation Gaming Operation and SGO shall meet on a quarterly basis, unless otherwise agreed, to review past practices and examine methods to improve the regulatory and enforcement programs established pursuant to this Compact.
- (i) Restriction on SGO. SGO, and Immediate Family Members of such SGO, shall have no financial interest in Class III Gaming undertaken by the Nation pursuant to this Compact, other than an interest that accrues under State law solely by virtue of being a citizen of the State, or such interest that accrues under Nation law solely by virtue of Nation citizenship. SGO, and any Immediate Family Members of such SGO, shall not be employed by a person or entity required to be licensed pursuant to this Compact. This provision shall be in addition to, and not in derogation of, any applicable State law regarding conflicts of interest.

- (j) Cultural Exchange. The State agrees and understands that the Nation possesses its own unique social customs, traditions, laws, and history. In order to make SGO and State personnel working at, or in conjunction with, a Gaming Facility more aware of the Nation's culture, traditions, laws and history and for purposes of fostering an environment that is consistent therewith, the Nation may conduct periodic cultural seminars in a manner of its choosing for all such personnel. It shall be the policy of the Nation and the State that such employees attend such seminars.
- (k) Office space, parking. The SGA shall provide reasonable on-site office space at each Gaming Facility for use by SGO and for State personnel working at a Gaming Facility pursuant to this Compact. SGO and State personnel on official business may park at the nearest available parking space at the Nation's Gaming Facilities. The Nation Gaming Operation shall reserve at each Gaming Facility two parking spaces immediately adjacent to an entrance (other than the front entrance) to the Gaming Facility for use by State personnel in undertaking their duties under this Compact.

7. **LAW ENFORCEMENT MATTERS.**

- (a) Jurisdiction. Nothing in this Compact shall affect the law enforcement jurisdiction of the Nation or the State over the Nation's lands as provided by applicable law.

- (b) Nation Gaming Operation security personnel. The Nation Gaming Operation shall provide security personnel to protect each Gaming Facility, its employees, patrons and their property.

8. ACCOUNTING STANDARDS AND AUDITING REQUIREMENTS.

- (a) Books and records. The Nation Gaming Operation shall make and keep books and records that accurately and fairly reflect each day's transactions, including but not limited to receipt of funds, expenses, prize claims, prize disbursements or prizes liable to be paid, and other financial transactions of or related to the Nation's Gaming Facilities, so as to permit preparation of monthly and annual financial statements in conformity with Generally Accepted Accounting Principles as applied to the gaming industry and to maintain daily accountability. The Nation Gaming Operation's books and records shall be susceptible of an annual audit in accordance with this Compact, in accordance with Generally Accepted Accounting Principles. A chart of accounts, consistent with Appendix F shall be adopted.
- (b) Additional reports and records related to financial transactions. Upon SGA's request, the Nation Gaming Operation shall contemporaneously submit to SGO copies of all reports, letters, and other documents relating to its Class III Gaming activities filed with the National Indian Gaming Commission pursuant to 25 C.F.R. § 571.13. SGO shall maintain as strictly confidential all such reports, letters and documents in accordance with Paragraph 16.
- (c) Class III Gaming accounting and auditing procedures.
- (1) The Nation Gaming Operation shall, at its own expense, cause the annual financial statements of

the Gaming Facilities to be audited in accordance with Generally Accepted Auditing Standards as applied to audits for the gaming industry by a certified public accountant. Such audit may be conducted in conjunction with any other independent audit of the Nation, provided that the requirements of this Paragraph are met, and provided further that, the information in the audit not related to Class III Gaming shall not be requested by the SGO or provided by the SGA.

- (2) A copy of the current audited financial statement as it relates to the Nation's Class III Gaming activities, together with the report thereon of the Nation's independent auditor, shall be submitted on an annual basis to SGA not later than one hundred twenty (120) days following the end of the accounting period under review. Upon request by SGO, SGA shall promptly provide a copy of such current report to SGO.

- (3) Subject to the limitations set forth in Paragraph 8(c)(1) above, the Nation Gaming Operation shall require its independent auditor to render:
 - a. A report on the material weaknesses, if any, in accounting and internal controls.

 - b. A report expressing the opinion of the independent auditor based on his or her examination of the financial statements, on the extent to which the Nation's Class III

Gaming activities have followed in all material respects during the period covered by the examination, the system of accounting and internal controls adopted by the Nation. The independent auditor shall also make recommendations in writing regarding improvements in the system of accounting and internal controls as required by the National Indian Gaming Commission.

- (4) The Nation's independent auditor shall retain a copy of each audit report, together with copies of all engagement letters, management letters, supporting and subsidiary documents, and other work papers in connection therewith, for a period of not less than three (3) years.
- (5) The Nation Gaming Operation shall submit a copy of the reports required by Paragraph 8(c)(3) to SGA not later than one hundred twenty (120) days following the end of the accounting period under review or within thirty (30) days of receipt, whichever is earlier. Upon request by SGO, SGA shall promptly provide a copy of such current report to SGO.
- (6) Nothing herein shall be construed to affect the right of the SGO to request audits from SGA for the purpose of confirming compliance by the Nation Gaming Operation with the provisions of this Compact. All documents, materials, books and records reviewed and/or copied for purpose of such

audits shall be confidential in accordance with Paragraph 15 of this Compact. SGO shall bear the cost of such "additional audits" and such costs shall not be deemed "reimbursable expenses" for purposes of Paragraph 13.

9. **PERSONAL INJURY REMEDIES FOR PATRONS; INSURANCE REQUIREMENTS.**

- (a) Insurance requirements. During the term of this Compact, the Nation shall require the Nation Gaming Operation to obtain and maintain public liability insurance insuring the Nation Gaming Operation, its agents and employees against claims, demands or liability for bodily injury and property damages by or to a visitor at the Gaming Facilities arising out of or relating to the operation of the Gaming Facilities. Such liability insurance shall provide coverage of no less than five million dollars (\$5,000,000.00) per person and five million dollars (\$5,000,000.00) per occurrence, and shall cover both negligent and intentional torts.
- (b) Claims procedures. The Nation agrees that it will establish procedures applicable to the Gaming Facilities to govern the resolution of claims against the Nation Gaming Operation, its employees and agents that are covered by the insurance required pursuant to Paragraph 9(a). The procedures that the Nation will establish are set forth in Appendix H. It is understood that the Nation's agreement to this provision is not intended to and does not constitute a waiver of its sovereign immunity from suit with respect to any such claim.

10. **INTEGRITY OF GAMING DEVICES.**

(a) Designation of independent gaming test laboratory. The Nation Gaming Operation shall propose to the State, with supporting documentation, an independent gaming test laboratory that is competent and qualified to conduct scientific tests and evaluations of Gaming Devices and to otherwise perform the functions set out in the Paragraph 10. The selection of the independent gaming test laboratory is subject to this consent of the State, but the State shall not unreasonably withhold its consent if the independent gaming test laboratory holds a license in good standing in New Jersey, Nevada or Mississippi. If, at any time, any of the independent gaming test laboratory's licenses are suspended, terminated or subject to disciplinary action, the independent test laboratory shall discontinue its responsibility under this Paragraph 10 and the Nation Gaming Operation shall propose a new independent gaming test laboratory as provided herein.

(b) Testing and approval of Gaming Devices. The Nation Gaming Operation may not acquire or expose for play any Gaming Device unless:

(1) The manufacturer or distributor that sells, leases or distributes such Gaming Devices has obtained a Class III Gaming Service Enterprise License from the SGA; and

(2) The Gaming Devices, or a prototype thereof, have been tested, approved and certified by the

independent gaming test laboratory as meeting the requirements specified by this Compact, in accordance with the following process.

- (3) The Nation Gaming Operation shall provide, or require that the manufacturer provide, to the independent gaming test laboratory two (2) copies of each Gaming Device's illustrations, schematics, block diagrams, technical and operation manuals, program object and source codes, hexadecimal dumps (the compiled computer program represented in base 16 format), if any, and any other information requested by the independent gaming test laboratory. Upon consent of the manufacturer, the SGA shall also make all such materials available to the SGO, upon request, subject to Paragraph 15.

- (4) If requested by the independent gaming test laboratory, the Nation Gaming Operation shall require the manufacturer to transport not more than two (2) working models of a Gaming Device to a location designated by the laboratory for testing, examination or analysis. The independent gaming test laboratory shall provide to the Nation Gaming Operation and to the SGO a report that contains findings, conclusions and a certification that the Gaming Devices conform or fail to conform to the requirements specified by this Compact. If the independent gaming test laboratory determines that such Gaming Device fails to conform to such requirements, and if modifications can be made that would bring the Gaming Device into compliance, the

report may contain recommendations for such modifications.

- (5) The manufacturer or distributor shall assemble and install all Gaming Devices in a manner approved by the independent gaming test laboratory.

(c) Modifications of Gaming Devices.

- (1) No modification to the assembly or operations of any Gaming Device may be made after testing and certification unless the independent gaming test laboratory certifies to the SGA that the Gaming Device as modified conforms to the requirements specified by this Compact. All such proposed modifications shall be described in a written request made to SGA and the independent gaming test laboratory and promptly disclosed to the SGO. The request shall contain information describing the modification and the reason(s) therefor, and shall provide all documentation required by the independent gaming test laboratory. In emergency situations in which modifications are necessary to preserve the integrity of a Gaming Device, the independent gaming test laboratory is authorized to grant temporary certification of the modifications of up to thirty (30) days pending compliance with this Paragraph 10.
- (2) With respect to any modifications proposed to a Gaming Device, the Nation Gaming Operation shall

advise the SGO in writing of any such modification no less than ten (10) days prior to implementing the modification, and the SGO shall have the right to request that the SGA seek prompt testing and certification of the modification. However, the Nation Gaming Operation shall not be precluded from implementing such modification prior to any such request. The modification shall be withdrawn if the independent gaming test laboratory concludes that the modified Gaming Device fails to conform to the requirements specified by this Compact.

- (d) Conformity to technical standards. Before exposing a Gaming Device for play, the Nation Gaming Operation must first obtain and submit to the SGA a written certification from the manufacturer or distributor that upon installation each such Gaming Device placed at the Nation's Gaming Facilities: conforms precisely to the exact specification of the Gaming Device tested and approved by the independent gaming test laboratory; and operates and plays in accordance with the requirements specified in this Compact. SGA shall promptly provide a copy of such certification to SGO.

- (e) Ex parte communication. Neither Party shall communicate with the independent gaming test laboratory, whether in writing, or by telephone or otherwise, concerning the approval of the Gaming Devices without providing the other Party with a reasonable opportunity to participate in or respond to such communication, provided that disclosures of information under Paragraph 10(b)(3) above may not be made to SGO without the prior consent of the

manufacturer. The Nation Gaming Operation, SGA and the SGO, except as provided by Paragraph 10(b)(3) above, shall ensure that copies of all written communications sent to or received from the independent gaming test laboratory are provided immediately to the other Party.

- (f) Payment of independent gaming test laboratory fees. The Nation Gaming Operation shall be responsible for the payment of all original independent gaming test laboratory fees and costs, and fees for modifications made at SGA's request, in connection with the duties described in this Paragraph. SGO shall bear the cost of any duplicate or "random" testing initiated at the request of SGO. SGA shall provide to the SGO copies of all independent gaming test laboratory invoices and payments by the Nation Gaming Operation, which shall have the right to audit such fees.

- (g) Independent gaming test laboratory duty of loyalty. The Nation Gaming Operation shall inform the independent gaming test laboratory in writing that, irrespective of the source of its fees, the independent gaming test laboratory's duty of loyalty and reporting requirements run equally to the Nation Gaming Operation, SGA and to the SGO.

11. SITES FOR GAMING FACILITIES.

(a) Subject to the provisions of this Paragraph 11, the Nation may establish Gaming Facilities:

(1) in Niagara County, at the location in the City of Niagara Falls indicated on the map of downtown Niagara Falls attached as Appendix I, or at such other site as may be determined by the Nation in the event the foregoing site is unavailable to the Nation for any reason; and

(2) in Erie County, at a location in the City of Buffalo to be determined by the Nation, or at such other site as may be determined by the Nation in the event a site in the City of Buffalo is rejected by the Nation for any reason; and

(3) on current Nation reservation territory, at such time and at such location as may be determined by the Nation.

(b) With respect to the sites referenced in subparagraphs 11(a)(1) and 11(a)(2):

(1) The sites shall be utilized for gaming and commercial activities traditionally associated with the operation or conduct of a casino facility;

(2) The State agrees to assist the Nation in acquiring the site set forth in Appendix I within the limits of the Seneca Settlement Act funds that the Nation

has committed to the acquisition of such site;

- a. No later than thirty (30) days after the execution of this Compact by both Parties, the State, through the Empire State Development Corporation ("ESDC") or otherwise, shall transfer fee title to the Niagara Falls Convention Center and such other property as the State may own within the boundaries of the parcel identified in Appendix I in fee simple to the Nation in consideration of a payment from the Nation of one dollar (\$1.00) in funds appropriated by the Seneca Settlement Act;
- b. The Nation shall lease back to the State the Niagara Falls Convention Center building for a period of twenty-one (21) years for an annual lease payment of one dollar (\$1.00);
- c. The State, in turn, shall lease to the Nation the Niagara Falls Convention Center building for a period of twenty one (21) years for an annual lease payment of one dollar (\$1.00) until such time as the Nation constructs and begins operation of a permanent Gaming Facility in the Niagara Falls, at which time the Nation shall pay to the State the balance, as of July 1, 2002, of the general obligation bonds pledged in connection with the Niagara Falls Convention Center; and,

- d. The State shall assist the Nation in whatever manner appropriate, including the exercise of the power of eminent domain, to obtain the remaining lands described in Appendix I on the best economic terms possible. In the event the State does obtain all or part of the lands described in Appendix I through exercise of the power of eminent domain, it shall promptly convey such lands to the Nation at a price equal to the cost of acquisition.
- (3) The State shall support the Nation in its use of the procedure set forth in the Seneca Settlement Act, 25 U.S.C. §1774f(c), to acquire restricted fee status for the site described in Appendix I and any other site chosen by the Nation pursuant to Paragraphs 11(a)(1) and 11(a)(2), to which the State has agreed, such agreement not to be unreasonably withheld. For purposes of such support from the State, the State shall assist the Nation directly with the Department of the Interior, either in writing or in person, as the Parties deem appropriate and necessary to obtain expeditious action on the Nation's notifications under section 1774f(c) of the Seneca Settlement Act and on any other application made by the Nation to obtain requisite approvals.
- (4) The Nation agrees that it will use all but five million dollars (\$5,000,000.00) of the funds remaining from amounts appropriated by the Seneca Settlement Act to acquire the parcels in the City

of Niagara Falls and the City of Buffalo.

- (c) The Nation agrees that it will dedicate Seneca Settlement Act funds remaining after the acquisition of the sites referenced in Paragraph 11(a)(1) and 11(a)(2) to the acquisition of parcels to meet the housing needs of the Nation's members. Unless otherwise agreed by the Parties, such housing parcels shall be physically and immediately contiguous and adjacent to either: (i) an existing reservation of the Nation, or (ii) the sites referenced in Paragraph 11(a)(1) and 11(a)(2) if actually acquired. The State shall support the Nation in development of such housing projects and shall support any notification made by the Nation under section 1774f of the Seneca Settlement Act for a housing development for Nation members.

- (d) The Parties agree that host municipalities should be compensated to be able to adjust to the economic development expected to result from the Gaming Facilities authorized under this Compact. Consistent with this goal, the State shall reach financial agreements with the host municipal governments, and any payments made pursuant to such agreements shall be made by the State.

12. EXCLUSIVITY AND STATE CONTRIBUTION.

(a) Exclusivity.

- (1) Subject to subparagraphs 12(a)(2) and 12(a)(3), the Nation shall have total exclusivity with respect to the installation and operation of, and no person or entity other than the Nation shall be permitted to install or operate, Gaming Devices, including slot machines, within the geographic area defined by: (i) to the east, State Route 14 from Sodus Point to the Pennsylvania border with New York; (ii) to the north, the border between New York and Canada; (iii) to the south, the Pennsylvania border with New York; and (iv) to the west, the border between New York and Canada and the border between Pennsylvania and New York.

- (2) In the event the Tuscarora Indian Nation or the Tonawanda Band of Seneca Indians initiate negotiations with the State to establish a Class III Gaming compact, the State may agree to include Gaming Devices in any such compact that permits gaming facilities within the geographical area of exclusivity set forth in Paragraph 12(a)(1) without causing a breach of this Paragraph 12; (i) provided, however, that in no event shall the State permit another Indian nation to establish a Class III Gaming facility within a twenty five (25) mile radius of any Gaming Facility site authorized under this Compact unless such facility is to be established on federally recognized Indian lands

existing as of the Effective Date of this Compact.

- (3) The exclusivity granted under Paragraph 12(a)(1) shall cease to apply with respect to any one of the sites authorized under this Compact: (i) if the Nation fails to commence construction on such site with thirty six (36) months of the Effective Date; or (ii) if the Nation fails to commence Class III Gaming operations on such site within sixty (60) months of the Effective Date.
- (4) With the exception of a violation of the proviso set forth in Paragraph 12(a)(2)(i), the Nation's obligation to pay and the State's right to receive the State Contribution from the operation and conduct of a particular category of Gaming Device as defined in Paragraph 1(m) shall cease immediately in the event of a breach by the State of the exclusivity provisions set forth in this Paragraph 12(a) only as to that particular category of Gaming Device for which exclusivity no longer exists.
- (5) With respect to a violation of the proviso set forth in Paragraph 12(a)(2)(i), the Nation's obligation to pay and the State's right to receive the State Contribution shall cease immediately as to all categories of Gaming Devices.

(b) State Contribution.

- (1) In consideration of the exclusivity granted by the State pursuant to Paragraph 12(a), the Nation agrees to contribute to the State a portion of the proceeds from the operation and conduct of each category of Gaming Device for which exclusivity exists, based on the net drop of such machines (money dropped into machines, after payout but before expense) and totaled on a cumulative quarterly basis to be adjusted annually at the end of the relevant fiscal year, in accordance with the sliding scale set forth below ("State Contribution"):

Years 1-4

18%, with "Year 1" commencing on the date on which the first Gaming Facility established pursuant to this Compact begins operation, and with Payments during this initial period are to be made on an annual basis.

Years 5-7

22%, with payments during this period to be made on a semi-annual basis.

Years 8-14

25%, with payments during this period to be made on a quarterly basis.

- (2) In the event the States reaches a compact with

another Indian tribe regarding Gaming Devices of a like kind that has State contribution provisions that are more favorable to the Indian tribe than those set forth herein, the terms of such other compact shall be automatically applicable to this Compact at the Nation's option.

- (3) Any dispute regarding a payment by the Nation of the State Contribution must be raised within one (1) year of the receipt by the State of the audited financial statements required pursuant to Paragraph 8(c)(2).

13. **REIMBURSEMENT FOR STATE COSTS OF OVERSIGHT.**

Pursuant to Section 2710(d)(3)(c)(iii) of the IGRA, the Nation shall reimburse the State for certain costs associated with the oversight of this Compact, as set forth in Appendix G.

14. PARTY DISPUTE RESOLUTION.

- (a) Purpose. The Nation and the State intend to resolve disputes in a manner that will foster a spirit of cooperation and efficiency in the administration of and compliance by each Party with the provisions of this Compact.
- (b) Negotiation. In the event of any dispute, claim, question, or disagreement arising from or relating to this Compact or the breach hereof, the Parties shall use their best efforts to settle the dispute, claim, question or disagreement. To this effect, either Party may provide written notice of a claim to the other. Upon receipt of such written notice, the Parties shall then meet within fourteen (14) days, shall negotiate in good faith and shall attempt to reach a just and equitable solution satisfactory to both Parties.
- (c) Method of dispute resolution. If the Parties do not reach such solution within a period of thirty (30) days after such meeting, or if the Parties fail to meet and thirty (30) days pass after the written notice of a claim is received, then, upon notice by either Party to the other, either Party may submit the dispute, claim, question, or disagreement to binding arbitration.
- (d) Arbitration notice. The notice for arbitration shall specify with particularity the nature of the dispute, the particular provision of the Compact at issue and the proposed relief sought by the Party demanding arbitration; provided, however, that neither Party may

seek monetary damages for any alleged dispute, claim, question or disagreement.

- (e) Selection of arbitrators. Each Party shall select one arbitrator and the two arbitrators shall select the third.
- (f) Procedures for arbitration. Arbitration under this Paragraph shall be conducted in accordance with the rules of the American Arbitration Association or such other rules as the Parties may mutually agree.
- (g) Arbitration costs. The cost of the arbitration shall be shared equally by the Parties, but the Parties shall bear their own costs and attorneys' fees associated with their participation in the arbitration.
- (h) Remedies. The arbitrators shall exempt the Nation from the payment of the State Contribution for any breach of the State's commitments to exclusivity as set forth in Paragraph 12(a). For Material Breaches, the arbitrators may impose as a remedy only specific performance or termination of the Compact. For all other breaches other than Material Breaches, the arbitrators may impose as a remedy only specific performance. In no event shall monetary damages, other than specific performance, be available as a remedy to either Party for any alleged breaches of this Compact, including Material Breaches. An arbitration award against the Nation for specific performance that entails the payment of money to the State shall be satisfied solely and exclusively from the revenues of the Nation's Class III Gaming Facilities

operated pursuant to this compact. Either Party may apply to the arbitrators seeking injunctive relief for an alleged violation of this Compact, and with respect to the relevant site, until the arbitration award is rendered or the controversy is otherwise resolved.

- (i) Arbitration decision. The decision of the arbitrators shall be final, binding and non-appealable. Failure to comply with the arbitration award within the time specified therein for compliance, or should a time not be specified, then forty-five (45) days from the date on which the arbitration award is rendered, shall be deemed a breach of the Compact. The prevailing party in an arbitration proceeding may bring an action solely and exclusively in the U.S. District Court for the Western District of New York to enforce the arbitration award and the Parties agree to waive their sovereign immunity solely and exclusively for the strictly limited purpose of such an enforcement action in such court and for no other purpose.

15. CONFIDENTIALITY.

- (a) Purpose. The confidentiality provisions of this Paragraph 15 are necessary to ensure ongoing and candid disclosure of information by the Parties to each other as required by this Compact.

- (b) Nation disclosure. The Nation agrees that the Nation Gaming Operation will provide promptly records and information relating to its Class III Gaming operations to the SGO solely for oversight of the State Contribution on the condition that the State agrees that the access to and use of such documents and information is strictly limited to this purpose. The State shall maintain all such documents and information strictly confidential. The State shall promptly provide to the SGA any records or information relevant to SGA's responsibilities under this Compact.

- (c) Nation records. All records of the Nation Gaming Operation that are provided to the State under this Compact, and all information contained in such records, are confidential and proprietary information of the Nation. All such records, and copies of such records, shall remain the property of the Nation, irrespective of their location. All Nation records used by the State shall be returned to the Nation after the State's use of said records has ended.

- (d) State records. All records of the State that are provided to the Nation under this Compact, and all information contained in such records, are confidential and

proprietary information of the State. All such records, and copies of such records, shall remain the property of the State, irrespective of their location. All State records used by the Nation shall be returned to the State after the Nation's use of said records has ended.

- (e) Non-disclosure. The Nation and the State agree that all records of the Nation received by the State are exempt from disclosure under the New York Freedom of Information Law (Public Officers Law, sec. 84 *et seq.*). This Compact, as provided for under IGRA, establishes the federal legal standards for matters pertaining to Class III Gaming by the Nation and therefore preempts any State records law, including the New York Freedom of Information Law, with respect to records and information provided in accordance with this Compact. The State shall legally defend against disclosure under any applicable law of information provided by the Nation pursuant to this Compact.

- (f) Limited exceptions to policy of non-disclosure. The State may not disclose any records or documents provided by the Nation's Gaming Operation or SGA under this Compact; provided, however, that disclosure to a Nation, federal or state criminal agency pursuant to a duly authorized warrant of the U.S. District Court in the context of an ongoing criminal investigation may be made without the prior written consent of the Nation.

- (g) Notice to Nation. Notwithstanding Paragraph 15(e) above, the State shall provide prompt notice to the Nation's Gaming Operation of any other request or proposed form of

order relating to the disclosure of records provided by the Nation under this Compact. Except where ordered by a duly authorized U.S. District Court warrant, the State shall not disclose any such records, to a court or otherwise, without first providing the Nation with an opportunity to challenge the request for the records and to seek judicial relief to prevent disclosure.

16. AMENDMENT AND MODIFICATION.

- (a) Amendment and modification. The provisions of this Paragraph 16 shall govern the amendment and modification of this Compact. The Compact and its Appendices may be amended or modified by written agreement of the Nation and the State.
- (b) Compact revisions. A request to amend or modify the Compact by either Party shall be in writing, specifying the manner in which the Party requests the Compact to be amended or modified, the reason(s) therefor, and the proposed language. Representatives of the Parties shall meet within thirty (30) days of the request and shall expeditiously and in good faith negotiate whether and on what terms and conditions the Compact will be amended or modified. A request by the Nation to amend or modify any provision of the Compact shall be deemed a request to enter into negotiations for the purpose of entering into a Nation-State Compact subject to the provisions of 25 U.S.C. §2710(d); provided, however, that neither such request nor such negotiations shall be deemed to amend or modify the terms or effectiveness of this Compact unless, and then only to the extent that, modifications or amendments are agreed in writing by the Parties; provided, further, that any impasse in such negotiations shall not operate to terminate or invalidate this Compact.
- (c) Appendices provisions.
- (1) Automatic amendments. If the State (i) makes

lawful a Class III Gaming game not authorized to be conducted for any purpose by any person, organization or entity on the Effective Date of this Compact and the SGO adopts specifications for such game, or (ii) enters into a compact with any Indian tribe or nation governing the conduct of Class III Gaming game not authorized to be conducted by the Nation Gaming Operations under this Compact, and setting forth specifications for such game, then the State shall give the Nation Gaming Operation written notice of such action within thirty (30) days, identifying the game and its specifications. If the Nation Gaming Operation accepts such game and its specifications, it shall notify the State in writing and a corresponding amendment shall be made to the appropriate appendices hereunder to authorize the Nation Gaming Operation to conduct such games. If the Nation Gaming Operation submits its own specifications for such game, the State shall within thirty (30) days notify the Nation Gaming Operation that it has accepted or rejected the Nation Gaming Operation's proposed specifications. Failure to act within thirty (30) days shall be deemed a rejection of the proposed amendment. If the State accepts the Nation Gaming Operation's proposed specifications, amendments and modifications shall be made to the appropriate Appendices. If the State rejects the Nation Gaming Operation's proposed specifications, the Nation may commence arbitration as specified in this Compact solely on the issue of the State's good faith in its consideration of the Nation

Gaming Operation's proposed specifications.

- (2) Other amendments. The Nation Gaming Operation may make a request to amend or modify specifications for a currently approved game by submitting proposed amended or modified specifications in writing to the State. The State shall within thirty (30) days notify the Nation Gaming Operation that it has accepted or rejected the Nation Gaming Operation's proposed specifications. Failure to act within thirty (30) days shall be deemed a rejection of the proposed amendment. If the State accepts the Nation Gaming Operation's proposed specifications, the appropriate amendments and modifications shall be made to Appendices. If the State rejects the Nation Gaming Operation's proposed specifications, the Nation may commence arbitration as specified in this Compact on the issue of the State's good faith in its consideration of the Nation Gaming Operation's proposed specifications.
- (3) Except as provided in Paragraphs 16(c)(1) and 16(c)(2) above, if a Party seeks to amend or modify a provision of any of the Appendices to this Compact, it shall notify the other Party in writing. The Party receiving such notice shall within thirty (30) days notify the Party requesting the amendment or modification that it accepts or rejects the proposed amendment or modification. If the proposed amendment or modification is accepted, it shall be effective upon the written acceptance

of the other Party. If the proposed amendment or modification is rejected, the Party proposing it may commence arbitration as specified in this Compact on the issue of the State's good faith in considering the Nation's proposed amendment or modification.

17. **MISCELLANEOUS.**

(a) Calculation of time. In computing any period of time prescribed by this Compact or any laws, rules or regulations of the Nation, the day of the event from which the designated period of time begins to run shall not be included. A calendar day includes the time from midnight to eleven fifty-nine and fifty-nine seconds past meridian. Periods of less than ten (10) days shall be construed as business days. Periods of eleven (11) days or more shall be construed as calendar days.

(b) Severability.

(1) Except for Paragraph 3, if any Paragraph or provision of this Compact is held invalid by a federal court, or its application to a particular activity is held invalid, it is the intent of the Parties that the remaining Paragraphs and provisions, and the remaining applications of such Paragraphs and provisions, shall remain in full force and effect.

(2) Application of the provisions of Paragraph 12(a)(4), terminating the State Contribution in the event of the State's breach of its exclusivity obligation under Paragraph 12(a), shall not affect the validity of any other provision of this Compact.

(c) Official notices and communications.

All notices and communications required or authorized to be served in accordance with this Compact shall be served by Certified Mail at each of the following addresses:

Seneca Nation of Indians

Nation President
Seneca Nation of Indians
P.O. Box 231
Salamanca, New York 14779

Nation President
Seneca Nation of Indians
Route 438
Irving, New York 14081

Seneca Gaming Agency

State of New York

Governor
State of New York
The Capitol
Albany, New York 12224

State Gaming Officials

New York State Wagering Board
1 Watervliet Avenue Extension, Suite 2
Albany, New York 12206


or to such other address or addresses as either the

Nation or the State may from time to time designate in writing.

- (d) Further assurances. The Parties shall execute and deliver all further instruments and documents and take any further action that may be reasonably necessary to implement the intent and the terms and conditions of this Compact. Without limitation of the foregoing, consistent with the MOU, the Parties will jointly seek, in a timely manner, any further ratification of this Compact that may be required.

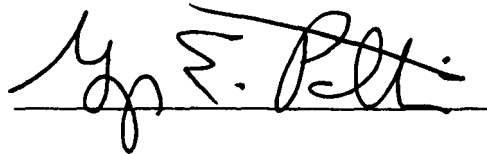
IN WITNESS WHEREOF, the Parties have executed this Agreement as of the date indicated below.

DATE: 8-18-02



PRESIDENT
SENECA NATION OF INDIANS

DATE: Aug 18, 2002



GOVERNOR
STATE OF NEW YORK

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Appendix A: Approved Games and Activities

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PREFACE

- (a) Organization. Each section is broken, as necessary, into the following order: subdivision, paragraph, subparagraph, clause, item and subitem.

- (b) Definitions. The following words and terms, when used in this Appendix, shall have the following meanings unless the context clearly indicates otherwise.
 - (1) "Boxperson" means the first-level supervisor who is responsible for directly participating in and supervising the operation and conduct of the game craps.

 - (2) "Dealer." refers to an individual assigned to operate games described in Appendix A.

 - (3) "Drop Box" means the box attached to a gaming table that is used to collect, but is not limited to, any of the following items:
 - a. Currency.

 - b. Coin.

 - c. Chips.

 - d. Cash equivalents.

 - e. Damaged chips.

 - f. Documents verifying the extension of credit.

- g. Request for fill and credit forms.
 - h. Fill and credit slips.
 - i. Error notification slips.
 - j. Table inventory forms.
 - k. All other forms used by the Nation Gaming Operation and deposited in the Drop Box as part of the audit trail.
- (4) "Gaming Facility Supervisor" or "Supervisor" is a person in a supervisory capacity required to perform certain functions under these Section, including but not limited to, Pit managers, floorpersons, gaming facility Shift managers, the assistant gaming facility manager and the gaming facility manager;
- (5) "Hand" means either one game in a series, one deal in a card game, or the cards held by a player in a card game.
- (6) "Lammer" is a disk that denotes the amount of Vigorish owed by a player if the Vigorish is not paid at the conclusion of the Hand.
- (7) "Layout" means the cloth covering a gaming table, containing designated areas for patrons to place the various wagers of the game, and such rules of the game, payoff odds and other information or graphics as the Seneca Gaming Authority ("SGA") and the State Gaming Officials ("SGO") shall require.

- (8) "Match Play Coupon" means a coupon with a fixed, stated value that is issued, utilized and redeemed, and the stated value of which, when presented by a patron with gaming chips which are equal to or greater in value to the stated value of the coupon, is included in the amount of the patron's wager in determining the Payout on any winning bet at an authorized game.
- (9) "Payout" means the winnings that result from a wager.
- (10) "Pit" means the area enclosed or encircled by the arrangement of the gaming tables in which Nation Gaming Operation personnel administer and supervise the live games played at the tables by patrons located outside the perimeter of the area.
- (11) "Shift" means the normal daily work period of a group of employees administering and supervising the operations of live gaming devices;
- (12) Shuffle. A "Shuffle" is the random intermixing of cards. Procedures for any proposed manual Shuffle to be used by the Nation Gaming Operation shall be submitted to the SGA for written approval.
- (13) "Stickperson" shall mean the Dealer that controls and secures the dice used in the game craps, who may also be required to accept and pay off certain wagers therein.
- (14) "Stub" means the remaining portion of the deck after all cards in a round of play have been dealt.

- (15) "Supervisor" means a person employed in the operation or the authorized games in a gaming facility in a supervisory capacity or empowered to make discretionary decisions which regulate casino operations, including but not limited to, Pit managers, floorpersons, gaming facility Shift managers, the assistant gaming facility manager and the gaming facility manager.
- (16) "Vigorish" means the amount that may be charged by the Nation Gaming Operation on a winning wager as provided herein.
- (17) "Washing" or "Chernmy Shuffle" means a mixing of the cards, during which the cards are placed face down on the table and randomly intermixed by the Dealer using the heels of the palms of the hands, by rotating one hand in a circular clockwise motion and the other hand in a circular counterclockwise motion, with each hand completing at least eight full circles.

(c) Procedures that are to be established pursuant to this Appendix shall be initially approved by both the SGA and the SGO. Subsequent modifications to such procedures shall be submitted by the Nation Gaming Operation to the SGA for its approval in writing, with a copy to SGO. SGA shall approve such proposed modifications only if they do not substantially alter the conduct of the game or have an adverse effect on the integrity of the game. Modifications will not take effect unless approved by the SGA in writing. SGO may object within seven (7) days of receipt of notice of any proposed modification of procedures established pursuant to this Appendix if it believes such modifications would substantially

alter the conduct of the game or have an adverse effect on the integrity of the game in question. SGA shall stay approval of the proposed modification upon receipt of SGO's written objection. SGA and SGO shall promptly meet to discuss such objection and seek mutual agreement on the proposed modification. If SGA and SGO are unable to reach agreement, either party may submit the question to the dispute resolution procedures set forth in Section 14 of the Compact.

1. Baccarat

(a) Equipment

(1) Table. Baccarat shall be played at a table having on one side places for the players and on the opposite side a place for the Dealer. Each Baccarat table shall have a Drop Box and a tip box attached to the Dealer's side of the gaming table in a location approved in writing by the SGA and the SGO.

{2} Layout. A Layout for a Baccarat table shall be approved in writing by the SGA and the SGO and shall contain, at a minimum:

- a. The name or logo of the gaming facility;
- b. Specific areas designated for the placement of wagers on the "Banker's Hand," "Players Hand" and "Tie Hand";
- c. The inscription "Tie Bets pay 8 to 1";
- d. Numbered areas that correspond to the seat numbers for the purpose of marking Vigorish;
- e. Areas designated for the placement of cards for the "Player's Hand" and "Banker's Hand."

(3) Marker buttons. If marker buttons are used for the purpose of marking Vigorish, these marker buttons shall be placed in the table inventory float container or in a

separate rack designed for the purpose of storing marker buttons and such rack shall be placed in front of the table inventory float container during gaming activity.

- (4) Cards. Baccarat shall be played with at least six decks of cards, which shall meet the requirements of Appendix B, Section 69, with backs of the same color and design and two additional cutting cards. The cutting cards shall be opaque and in a solid color readily distinguishable from the color of the backs and edges of the playing cards, as approved in writing by the SGA and the SGO. All cards opened for use on a Baccarat table shall be changed at least once every four hours.
 - (5) A dealing shoe, which shall meet the requirements of Appendix B, Section 71.
 - (6) Discard bucket. In order to collect the cards at the conclusion of a round of play and at such other times as provided in the Compact or its Appendices, each Baccarat table shall have a discard bucket securely attached to it.
 - (7) Automated card shuffling device (Optional) . An automated card shuffling device is a device which can automatically perform a Shuffle. Such a device shall meet the requirements of Appendix B, Section 71.
- (b) Value of the Cards.
- (1) The "value" of the cards in each deck, regardless of suit, will be as follows:

- a. Any card from 2 to 9 will have its face value;
 - b. A 10, Jack, Queen or King will have a value of 0; and
 - c. An Ace will have the value of 1.
- (2) The "Point Count" of a Hand will be a single digit number from 0 to 9 inclusive and will be determined by totaling the value of all cards in the Hand. If the total of the cards in a Hand is a two-digit number, the left digit of such number will be discarded as having no value and the right digit will constitute the Point Count of the Hand. Examples of this rule are as follows:
- a. A Hand composed of an Ace, a 2 and a 4 has a Point Count of 7; and
 - b. A Hand composed of an Ace, a 2 and a 9 has a total value of 12 but only a Point Count of 2 since the digit 1 in the number 12 must be discarded.
- (c) Types of wagers
- (1) The following wagers shall be permitted to be made by a participant at the game of Baccarat:
- a. A wager on the "Banker's Hand" which will:
 - 1. Win if the "Banker's Hand" has a Point Count higher than that of the "Player's Hand";

2. Lose if the "Banker's Hand" has a Point Count lower than that of the "Player's Hand"; and
 3. Be void if the Point Count of the "Banker's Hand" and the "Player's Hand" are equal.
- b. A wager on the "Player's Hand" which will:
1. Win if the "Player's Hand" has a Point Count higher than that of the "Banker's Hand";
 2. Lose if the "Player's Hand" has a Point Count lower than that of the "Banker's Hand"; and
 3. Be void if the Point Count of the "Banker's Hand" and the "Player's Hand" are equal.
- c. A wager called a "Tie Bet" which will win if the Point Counts for the "Banker's Hand" and the "Player's Hand" are equal and will lose if such Point Counts are not equal.
- (2) Unless otherwise approved in writing by the SGA, the Nation Gaming Operation shall not accept wagers at the game of Baccarat other than those specified in paragraph (c) (1) above.
- (3) All wagers at Baccarat shall be made by placing gaming chips on the appropriate areas of the Baccarat Layout.

- (4) No wagers at Baccarat will be made, increased or withdrawn after the Dealer calling the game has announced "No More Bets" and makes a visible hand motion indicating "no more bets" will be accepted.

(d) Wager Payout, Vigorish

- (1) A winning wager made on the "Player's Hand" will be paid off by the Nation Gaming Operation at odds of 1 to 1.
- (2) A winning wager made on the "Banker's Hand" will be paid off by the Nation Gaming Operation at odds of 1 to 1, except that the Nation Gaming Operation will extract a Vigorish on the amount won at either four (4) percent or five (5) percent of such amount. Wagers will be accepted in five (5) dollar increments only, and therefore the Vigorish will increase in twenty cent (\$0.20) increments if the Vigorish is four (4) percent or in twenty five cent (\$0.25) increments if the Vigorish is five (5) percent. The Nation Gaming Operation may collect the Vigorish from a participant at the time the winning payoff is made or may defer it to a later time provided, however, that all outstanding Vigorish shall be collected prior to reshuffling the cards in a shoe; in no event will the collection of any Vigorish be deferred beyond such point. The amount of any Vigorish not collected at the time of the winning Payout will be evidenced by the placing of coins or marker buttons (Lammers) reflecting the amount owed imprinted thereon, along with the seat number of the participant owing such Vigorish.
 - a. The Nation Gaming Operation shall notify the SGA

and the SGO in writing twenty-four (24) hours in advance of any change in the Vigorish percentage.

- b. The Nation Gaming Operation shall conspicuously post at all Baccarat tables the Vigorish percentage in effect.
- c. When four (4) percent Vigorish is in effect, the Nation Gaming Operation shall utilize twenty cent (\$0.20) denomination marker buttons (Lammers) and twenty five cent (\$0.25) denomination marker buttons when five (5) percent Vigorish is in effect.
- d. The Vigorish percentage shall be the same for all Baccarat tables at all times, and any change to the Vigorish percentage will be done uniformly for all

Baccarat tables throughout the Nation Gaming Operation. Vigorish percentages may differ, however, between Baccarat and Minibaccarat.

- (3) A winning "Tie Bet" will be paid off by the Nation Gaming Operation at odds of at least 8 to 1.

(e) Opening of table for gaming

- (1) After receiving the six (6) or more decks of cards at the table, the Dealer shall sort and inspect each face-down decks of cards separately and the floorperson assigned to the table shall verify the inspection.

- (2) After the cards are inspected, they shall be spread out face upwards on the table for visual inspection by the first player or players to arrive at the table. The cards shall be spread out in horizontal fan shaped columns by deck according to suit and in sequence. The cards in each suit shall be laid out in sequence within the suit.
 - (3) After the first player or players is afforded an opportunity to visually inspect the cards, the cards shall be turned face downward on the table, mixed thoroughly by a "Washing" of the cards and stacked.
 - (4) If an automated shuffling device is utilized, all of the decks in one batch of cards shall be spread for inspection on the table separately from the decks in the other batch of cards. After the player or players is afforded an opportunity to visually inspect the cards, each batch of cards shall separately be turned face downward on the table, washed and stacked.
- (f) Shuffle and cut of the cards
- (1) Immediately prior to the commencement of play and after each shoe of cards is completed, the Dealer or electromechanical card-shuffling device shall Shuffle the cards so that they are randomly intermixed.
 - (2) After the cards have been Shuffled, the Nation Gaming Operation may choose to have the Dealer lace approximately one (1) deck (or more) of cards so that they are evenly dispensed into the remaining stack. The

Dealer calling the game will then offer the stack of cards, with backs facing away from him or her, to the participants to be cut. The Dealer will begin with the participant seated in the highest number position at the table or, in the case of a reshuffle, the last curator and, working clockwise around the table, will offer the stack to each participant until a participant accepts the cut. If no participant accepts the cut, the Dealer shall cut the cards.

- (3) The cards shall be cut by placing the cutting card in the stack at least ten (10) cards in from either end.
- (4) Once the cutting card has been inserted into the stack, the Dealer shall take all cards in front of the cutting card and place them to the back of the stack. The Dealer shall then insert one (1) cutting card in a position at least fourteen (14) cards in from the back of the stack and the second cutting card at the end of the stack. The stack of cards shall then be inserted into the dealing shoe for commencement of play. Prior to commencement of play, the Dealer shall remove the first card from the shoe and place it face up, and then remove an additional amount of cards equal to the value of the first card drawn and place them, face down, in the discard bucket. For purposes of this paragraph, face cards and tens count as tens; Aces count as one.

(g) Dealing the game of Baccarat

- (1) At the commencement of play, the Dealer calling the game

will offer the shoe to the participant in seat number one at the table. If such participant rejects the shoe or if there is no one in seat number one, the Dealer shall offer the shoe to each of the other participants, in turn, counterclockwise around the table until one of the participants accepts it.

- (2) The participant to accept the shoe, (hereinafter called the "curator"), shall be responsible for dealing the cards in accordance with this section and the instructions of the Dealer calling the game.
- (3) There shall be two Hands dealt in the game of Baccarat, one of which will be designated the "Player's Hand" and the other designated the "Banker's Hand".
- (4) At the commencement of each round of play, the Dealer calling the game will announce "No More Bets" after which he or she shall instruct the curator to commence dealing the cards by announcing "Cards".
- (5) The curator shall deal an initial four cards from the shoe. The first and third card dealt shall constitute the first and second cards of the "Player's Hand". The second and fourth card dealt shall constitute the first and second cards of the "Banker's Hand". After the cards are dealt to each Hand, the Dealer calling the game shall place them face upwards in front of himself or herself.
- (6) After the initial four cards have been dealt, the Dealer calling the game shall announce the Point Count of the

"Player's Hand" and Point Count of the "Banker's Hand".

- (7) Following the announcement of the Point Counts of each Hand, the Dealer calling the game shall instruct the curator whether to deal a third card to each Hand which instructions shall be in conformity with the requirements of paragraphs (g) (10) through (g) (14) (c) below, inclusive.
- (8) Any third card required to be dealt by the Dealer's instructions shall first be dealt face upwards to the "Player's Hand" and then to the "Banker's Hand" by the curator.
- (9) Whenever the cutting card appears during play, the cutting card shall be removed and placed to the side and the Hand shall be completed. Upon completion of that Hand, the Dealer calling the game shall announce "Last Hand". At the completion of one more Hand, no more cards shall be dealt until a new Shuffle occurs.
- (10) If the Point Count of either the "Player's Hand" or the "Banker's Hand" after the initial two cards are dealt to each is an 8 or a 9 (which shall be called a "Natural") ,no more cards shall be dealt to either Hand.
- (11) If the Point Count of the "Banker's Hand" on the first two cards is 0 to 7 inclusive, the "Player's Hand" shall draw (i.e., take a third card) or stay (i.e., not take a third card) in accordance with the requirements of Table 1 below:

TABLE 1

Player	Third Card Determination
Oto 5	Draws
6 to 9	Stays

(12) If the Point Count of the "Player's Hand" on the first two cards is 6 or 7 (i.e. player stands), the "Banker's

Hand" will always draw on totals of 0, 1, 2, 3, 4 and 5 and stand on totals 6, 7, 8 or 9.

(13) The total of the initial two cards dealt to the "Banker's Hand" along with the third card dealt to the "Player's Hand" determines if a third card is dealt to the "Banker's Hand" in accordance with the requirements of Table 2 below:

TABLE 2

Banker Having	Draws when Player's 3rd card is Player's	Does not draw when 3rd card is
0, 1, 2	always draws except when player has 8 or 9	
3	0-1-2-3-4-5-7-9	8
4	2-3-4-5-6-7	0-1-8-9
5	4-5-6-7	0-1-2-3-8-9

6	6-7	0-1-2-3-4-5-8-9
7	stands	stands
8-9	natural stand	natural stand

(14) The method of using Table 2 will be to find the Point Count of the "Banker's Hand" and trace that horizontally across the table until the point value of the Player's third card *is* located. The "Banker's Hand" will stand or draw as listed in vertical column 2 or 3 in accordance with the following:

- (a) The first vertical column in Table 2 labeled "Banker Having" will refer to the Point Count of the "Banker's Hand" after the first two cards have been dealt to it.
- (b) The second vertical column in Table 2 labeled "Draws when Player's 3rd card is" will refer to the value of the third card drawn by the "Player's Hand" as distinguished from the Point Count of the "Player's Hand."
- (c) The third vertical column in Table 2 labeled "Does not draw when Player's 3rd card is" will refer to the value of the third card drawn by the "Player's Hand" as distinguished from the Point Count of the "Player's Hand."

(h) Announcement of result of round; collection and payment of wagers

- (1) After each Hand has received all the cards to which it is entitled pursuant to these procedures, the Dealer shall announce the final Point Count of each Hand indicating which Hand has won the round. If the two Hands have equal Point Counts, the Dealer shall announce "Tie Hand."

- (2) After the result of the round is announced, the Dealer or Dealers responsible for the wagers on the table shall first collect each losing wager. Thereafter, the Dealer or Dealers shall, in accordance with one of the following procedures, pay each winning wager and collect or mark any Vigorish owed.
 - a. Starting at the highest numbered player position at which a winning wager is located and proceeding in descending order to each next highest numbered player position, the Dealer shall first pay each winning wager and then, returning to the highest numbered player position at which a winning wager was located and proceeding in like order, mark or collect the Vigorish owed by each player.

 - b. Starting at the highest numbered player position at which a winning wager is located and proceeding in descending order to each next highest numbered player position, the Dealer shall first mark or collect the Vigorish owed by each player and then, returning to the highest numbered player position at which a winning wager is located and proceeding in like order, pay each winning wager.

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prior to the implementation of or a change in the particular procedure to be used at a table or gaming Pit.

(i) Continuation of curator as such; selection of new curator

(1) It shall be the option of the curator, after any round of play, either to pass the shoe or remain as curator except that:

a. The curator shall pass the shoe whenever the banker's Hand loses; and

b. The Dealer or floorperson assigned to the table may order the curator to pass the shoe if the curator unreasonably delays the game, repeatedly makes invalid deals or violates either the Compact, its Appendices or the approved system of internal controls.

(2) Whenever a voluntary or compulsory relinquishment of the shoe occurs, the Dealer shall offer the shoe to the participant immediately to the right of the previous curator and, if he or she does not accept it or there is no participant in that position, the Dealer shall offer the shoe to each of the other participants, in turn, counterclockwise around the table. The first to accept the shoe when offered shall become the new curator.

(ii) Irregularities.

(1) A third card dealt to the "Player's Hand" when no third

card is authorized under these procedures will become the third card of the "Banker's Hand" if the "Banker's Hand" is obliged to draw by Table 2. If, in such circumstances, the "Banker's Hand" is required to stay, the card dealt in error will become the first card of the next Hand unless it has been disclosed. In such case, the disclosed card and an additional number of cards equal to the value of this card will be drawn face upwards from the shoe and placed in the discard bucket.

- (2) A card drawn in excess from the shoe, if not disclosed, shall be used as the first card of the next Hand of play. If the card has been disclosed, a burn card procedure as described in paragraph (j) (1) above shall be implemented.
 - (3) A card found face upwards in the shoe shall not be used as the first card of the next Hand of play. If the card has been disclosed, a burn card procedure as described in paragraph (j) (1) above shall be implemented.
 - (4) A card found face upwards in the shoe shall not be used in the game and shall be placed in the discard bucket, along with an additional amount of cards, drawn face upwards, equal to the value of the cards found face upwards in the shoe.
 - (5) If there are insufficient cards remaining in the shoe to complete a round of play, that round shall be void and a new round shall commence after a new Shuffle is completed.
- (k) Minimum wagers and maximum wagers.

The Nation Gaming Operation shall determine the minimum and maximum wagers at each table. The amounts of the minimum and maximum wagers shall be conspicuously posted on a sign at each table.

2. Bang

(a) Equipment.

- (1) Table. Bang shall be played at a table having on one side places for the players and on the opposite side a place for the Dealer. Each Bang table shall have a Drop Box and a tip box attached to the Dealer's side of the gaming table in a location approved in writing by the SGA and the SGO.
- (2) Layout. The Layout for a Bang table shall be approved in writing by the SGA and the SGO and shall contain, at a minimum:
 - a. The name or logo of the Nation Gaming Operation; and
 - b. Specific areas designated for the placement of wagers. The sections marked "Beat the Dealer Hi Dice" on the Layout are considered the outside sections of the Layout and are referred to as "outside bets." All other betting spaces on the Layout are considered to be inside sections or "inside bets."
 - c. The inscription "Dealer wins all ties on Beat the Dealer Hi Dice Bets."
- (3) Five dice, each of which shall conform to the specifications and requirements of Appendix B, Section 66.

(b) Permissible wagers. Each player may wager that the two dice, after being rolled, once by the Dealer and a second time by a player, will result in particular combinations or that certain events will occur in particular order. The following shall constitute the definitions of permissible combinations or events upon which a player may wager at the game of Bang:

- (1) Field Bet. The player wagers that the total count of the two dice on the next roll will equal 2, 3, 4, 9, 10, 11 or 12.
- (2) Under Seven. The player wagers that the total count of the two dice on the next roll will equal 2, 3, 4, 5 or 6.
- (3) Any Seven. The player wagers that the total count of the two dice on the next roll will equal 7.
- (4) Over Seven. The player wagers that the total count of the two dice on the next roll will equal 8, 9, 10, 11, or 12.
- (5) Big Six. The player wagers that a two dice total count of 6 will be rolled before a two dice total count of 7.
- (6) Big Eight. The player wagers that a two dice total count of 8 will be rolled before a two dice total count of 7.
- (7) Beat the Dealer Hi Dice. The player wagers that the two dice total count rolled by the player will exceed the two dice total count of the dice rolled by the Dealer.

(c) Wagering at Bang

- (1) All wagers at Bang shall be made by placing gaming chips and, if applicable, a Match Play Coupon on the appropriate areas of the Bang Layout.
 - (2) Each player shall be responsible for the correct positioning of his or her wagers on the Bang Layout regardless of whether the player is assisted by the Dealer.
 - (3) Each wager shall be settled strictly in accordance with its position on the Layout when the dice come to rest.
- (d) Dealing the game of Bang
- (1) Dice: retention; selection
 - a. A set five dice, each conforming to the specifications contained in Appendix B, Section 66, shall be present at the Bang table during gaming. Control of the dice at a Bang table, shall be the responsibility of the Dealer at the table.
 - b. At the commencement of play the Dealer shall offer the five dice to the player immediately to the left of the Dealer at the table. If such a player rejects the dice, the Dealer shall offer the dice to each of the other players, in turn, clockwise around the table until one of the players accepts the dice;
 - c. The first player to accept the dice when offered shall become the shooter, who shall select two of

the five dice offered and place them directly in front of the Dealer. The remaining three dice of the set shall be returned to the dice cup which shall be placed immediately in front of the Dealer.

- (2) All wagers at Bang shall be placed prior to the Dealer announcing "No more bets" and making a visible hand motion indicating no more bets are to be accepted.
- (3) The Dealer shall roll the dice so that they leave his or her hand simultaneously and in a manner calculated to cause them to strike the end of the table farthest from the shooter. The total count of the two dice that face upward when the dice come to rest are considered the "Dealer's point." The Dealer shall then place a marker on the Layout indicating his or her point.
- (4) Effect of Dealer's roll.
 - a. The Dealer's roll affects all inside bets, i.e., all bets on the Layout except Beat the Dealer Hi Dice bets. Big Six and Big Eight bets shall be active on every roll of the dice, but are only affected by a losing roll of 7, or by the roll of a winning 6 or 8, respectively.
 - b. All losing inside wagers shall be immediately collected by the Dealer and placed in the table inventory container.
 - c. Winning inside wagers shall then be paid in accordance with the Payout odds contained in

subdivision (f).

d. At the conclusion of paying the winning inside wagers the Dealer shall announce "Place inside bets only," and, after a short period of time, announce and signal "no more inside bets," making a visible hand motion indicating no more bets are to be accepted.

- (5) The first player to accept the dice shall roll next. This roll is relevant for all inside bets and for a 11 players that have made a "Beat the Dealer Hi Dice" wager.
- (6) The shooter shall roll the dice so that they leave his or her hand simultaneously and in a manner calculated to cause them to strike the end of the table farthest from him or her. The total count of the two dice that face upward when the dice come to rest are considered the player's point. The Dealer shall then place a marker different in appearance from the first marker utilized on the Layout indicating the "player's point."
- (7) Effect of player's roll.
- a. All losing outside wagers and inside wagers shall be immediately collected by the Dealer and placed in the table inventory container.
- b. The Dealer shall pay all winning outside wagers at 1 to 1 odds beginning with the location farthest to the right of the Dealer and continuing counterclockwise around the table.

- c. Winning inside wagers shall the then be paid in accordance with Payout odds contained in subdivision (f).

(e) Invalid roll of the dice

- (1) A roll of the dice shall be invalid whenever either or both of the dice go off the table, whenever one die comes to rest on top of the other, or whenever one dice comes to rest on the table chip inventory.
- (2) The persons listed in paragraph (e) (5) below shall have the authority to invalidate a roll of the dice by calling "No Roll" for any of the following reasons:
 - a. The dice do not leave the shooter's hand simultaneously;
 - b. Either or both of the dice fail to strike an end of the table;
 - c. Either or both of the dice come to rest on the chips constituting the bank of chips located in front of the Dealer.
 - d. Either or both of the dice come to rest in the dice cup in front of the Dealer or on one of the rails surrounding the table;
 - e. The use of a cheating, crooked or fixed device or technique in the roll of the dice; and

- f. For any other reason the Dealer considers the throw to be improper.

 - g. In the event either or both of the dice do not land flat on the table (for example, one edge of the die is resting cocked on a stack of chips), the side directly opposite the side that is resting on the chips or other object shall be considered upward. If more than one side of a die is resting on a stack of chips or other object, the roll shall be void and the dice shall be re-rolled.
-
- (3) The call of "No Roll" under either subparagraphs (e) (2) (a), (e)(2) (b) or (e) (2) (f) above shall, whenever possible, be made before both dice come to rest.

 - (4) A throw of the dice which results in the dice coming into contact with any Match Play Coupons or chips on the table, other than the bank of chips located in front of the Dealer, shall not be a cause for a call of "No Roll" .

 - (5) "No Roll" may be called by the Dealer or any other gaming employee designated in writing to the SGA by the Nation Gaming Operation, with a copy to the SGO.
-
- (f) Payout odds. Neither the Nation Gaming Operation nor any gaming employee thereof shall pay off winning wagers at the game of Bang at less than the odds listed below. The Nation Gaming Operation may pay off winning wagers at higher odds than those listed below provided that such odds are uniform within the gaming facility and the higher odds have been conspicuously posted.

Field Bet	1 to 1
Under Seven	1 to 1
Any Seven	4 to 1
Over Seven	1 to 1
Big Six	1 to 1
Big Eight	1 to 1
Beat the Dealer Hi Dice	1 to 1

The Nation Gaming Operation wins all wagers on Beat the Dealer Hi Dice when the player's point is identical to the Dealer's point.

(g) Minimum wagers and maximum wagers

The Nation Gaming Operation shall determine the minimum and maximum wagers at each table. The amounts of the minimum and maximum wagers shall be conspicuously posted on a sign at each table.

3. Beat the Dealer

(a) Equipment.

- (1) Table. Beat the Dealer shall be played at a table having on one side places for the players and on the opposite side a place for the Dealer. Each Beat the Dealer table shall have a Drop Box and a tip box attached to a location on the gaming table approved in writing by the SGA and the SGO.
- (2) Five dice, each of which shall conform to the specifications and requirements of Appendix B, Section 66;
- (3) Layout. The Layout for a Beat the Dealer table shall be approved in writing by the SGA and the SGO and shall contain, at a minimum:
 - a. The name or logo of the Nation Gaming Operation; and
 - b. Specific areas designated for the placement of the wagers; and
 - c. The Payout odds of 1 to 1.
 - d. The inscription "Dealer wins on all ties."

(b) Play of the game Beat the Dealer

- (1) Dice: retention; selection

- a. A set of at least five dice conforming to the specifications contained in Appendix B, Section 66 shall be present at the Beat the Dealer table during gaming. Control of the dice at a Beat the Dealer table, shall be the responsibility of the Dealer at the table.
 - b. At the commencement of play the Dealer shall offer the five dice to the player immediately to the left of the Dealer at the table. If such a player rejects the dice, the Dealer shall offer the dice to each of the other players, in turn, clockwise around the table until one of the players accepts the dice;
 - c. The first player to accept the dice when offered shall select two of the five dice offered and place them on the Layout directly in front to the Dealer. The remaining three dice of the set shall be returned to the dice cup which shall be placed immediately in front of the Dealer.
- (2) All wagers at Beat the Dealer shall be made by placing gaming chips and, if applicable, a Match Play Coupon on the appropriate areas of the Beat the Dealer Layout prior to the Dealer announcing "No more bets" and making a visible hand motion indicating no more bets are to be accepted.
 - (3) The Dealer shall roll the dice so that they leave his or her hand simultaneously and in a manner calculated to

cause them to strike the end of the table farthest from the shooter. The total count of the two dice that face upward when the dice come to rest are considered the "Dealer's point." The Dealer shall then place a marker on the Layout indicating his or her point.

- (4) The player rolls the dice next, with that roll affecting all Beat the Dealer wagers on the Layout. The player shall roll the dice so that they leave his or her hand simultaneously and in a manner calculated to cause them to strike the end of the table farthest from him or her. The total count of the two dice that face upward when the dice come to rest are considered the "player's point." The Dealer shall then place a marker different in appearance from the first marker utilized on the Layout indicating the "player's point."
- (5) All losing Beat the Dealer wagers shall be immediately collected by the Dealer and placed in the table inventory container.
- (6) The Dealer shall pay all winning Beat the Dealer wagers consistent with the requirements of subdivision (c) below beginning with the location farthest to the right of the Dealer and continuing counterclockwise around the table.

(c) Odds.

Neither the Nation Gaming Operation nor any gaming employee thereof shall pay off winning wagers at the game of Beat the Dealer at other than 1 to 1, with the Dealer winning on all ties.

(d) Invalid roll of the dice

- (1) A roll of the dice shall be invalid whenever either or both of the dice go off the table, whenever one die comes to rest on top of the other, or whenever one dice comes to rest on the table chip inventory.
- (2) The persons listed in paragraph (d) (5) below shall have the authority to invalidate a roll of the dice by calling "No Roll" for any of the following reasons:
 - a. The dice do not leave the shooter's hand simultaneously;
 - b. Either or both of the dice fail to strike an end of the table;
 - c. Either or both of the dice come to rest on the chips constituting the bank of chips located in front of the Dealer.
 - d. Either or both of the dice come to rest in the dice cup in front of the Dealer or on one of the rails surrounding the table;
 - e. The use of a cheating, crooked or fixed device or technique in the roll of the dice; and
 - f. For any other reason the Dealer considers the throw to be improper.
 - g. In the event either or both of the dice do not land

flat on the table (for example, one edge of the die is resting cocked on a stack of chips), the side directly opposite the side that is resting on the chips or other object shall be considered upward. If more than one side of a die is resting on a stack of chips or other object, the roll shall be void and the dice shall be re-rolled.

- (3) The call of "No Roll" under either subparagraphs (d) (2) (a), (d) (2) (b) or (d) (2) (f) above shall, whenever possible, be made before both dice come to rest.
 - (4) A throw of the dice which results in the dice coming into contact with any Match Play Coupons or chips on the table, other than the bank of chips located in front of the Dealer, shall not be a cause for a call of "No Roll".
 - (5) "No Roll" may be called by the Dealer or any other gaming employee designated in writing to the SGA by the Nation Gaming Operation, with a copy to the SGO.
- (e) Minimum Wagers and Maximum Wagers.

The Nation Gaming Operation shall determine the minimum and maximum wagers at each table. The amounts of the minimum and maximum wagers shall be conspicuously posted on a sign at each table.

4. Best Hand Poker

(a) Equipment.

- (1) Table. Best Hand Poker shall be played at a table having on one side places for the players and on the opposite side a place for the Dealer. Each Best Hand Poker table shall have a Drop Box and a tip box in a location approved in writing by the SGA and the SGO.
- (2) Layout. The Layout for a Best Hand Poker table shall be approved in writing by the SGA and the SGO and shall contain, at a minimum:
 - a. The name or logo of the Nation Gaming Operation; and
 - b. Ten areas designated for the placement of wagers numbered one through ten, sequentially.
- (3) Cards; number of decks
 - a. Except as provided in subparagraph (a) (3) (b) below, Best Hand Poker shall be played with one standard deck of cards with backs of the same color and design, one additional cutting card and one additional cover card. The cutting card and cover card shall be opaque and in a solid color readily distinguishable from the color of the backs and edges of the playing cards, as approved in writing by the SGA and the SGO. The deck of cards used to play Best Hand Poker shall meet the requirements of

Appendix B, Section 69.

- b. If an automated card shuffling device is used for Best Hand Poker, the Nation Gaming Operation shall be permitted to use a second deck of cards to play the game, provided that:
1. Each deck of cards complies with the requirements of subparagraph (a) above;
 2. The backs of the cards in the two decks are of a different color;
 3. One deck is being Shuffled by the automated card shuffling device while the other deck is being dealt or used to play the game;
 4. Both decks are continuously alternated in and out of play, with each deck being used for every other round of play; and
 5. The cards from one deck only shall be placed in the discard rack at any given time.
- c. All cards opened for use on a table and dealt from a manual or automated dealing shoe shall be changed at least once every eight hours. All cards opened for use on a table and dealt from the Hand shall be changed at least every four hours.

(4) Automated card shuffling device (Optional). An automated card shuffling device is a device which can automatically

perform a Shuffle. Such a device shall meet the requirements of Appendix B, Section 71.

- (5) A dealing shoe, which shall meet the requirements of Appendix B, Section 71. (optional).

(b) Opening of table for gaming

- (1) After receiving the one or more decks of cards at the table, the Dealer shall sort and inspect the faces and backs of the cards and the floorperson assigned to the table shall visually verify the inspection.
- (2) After the cards are inspected, the cards shall be spread out face upwards on the table for visual inspection by the first player or players to arrive at the table. The cards shall be spread out in horizontal fan shaped columns by deck according to suit and in sequence. The cards in each suit shall be laid out in sequence within the suit.
- (3) After the first player or players is afforded an opportunity to visually inspect the cards, the cards shall be turned face downward on the table, mixed thoroughly by a "Washing" of the cards and stacked.

(c) Shuffle and cut of the cards

- (1) Immediately prior to commencement of play and after each round of play, the Dealer shall wash and "Chemmy Shuffle" the cards so that they are randomly intermixed.

- (2) After the cards have been Shuffled, the Dealer shall offer the stack of cards, with backs facing away from him or her, to the players to be cut.
- (3) The player selected in a manner consistent with paragraph (c) (5) below shall cut the cards by placing the cutting card in the stack at least 10 cards in from either end.
- (4) Once the cutting card has been inserted by the player, the Dealer shall take all cards in front of the cutting card and place them to the back of the stack. The Dealer shall then take the entire stack of cards that was just Shuffled and, if applicable, align them along the side of the dealing shoe. Thereafter, the Dealer shall insert the cutting card in the stack at a position approximately one-quarter of the way in from the back of the stack. The stack of cards shall, if applicable, then be inserted into the dealing shoe for commencement of play.
- (5) The player to cut the cards shall be:
 - a. The first player to the table if the game is just beginning;
or
 - b. The player at the farthest point to the right of the Dealer.
- (6) If the player designated by paragraph (c) (5) above refuses the cut, the cards shall be offered to each other player, moving in turn from the Dealer's right to the Dealer's left, until a player accepts the cut. If no

player accepts the cut, the Dealer shall cut the cards.

- (7) After the cards have been cut but before any cards have been dealt, a gaming operations Supervisor may require that the cards be recut if he or she determines that the cut was performed improperly or in any way that might affect the integrity or fairness of the game. If a recut is required, the cards shall be recut, at the Nation Gaming Operation's option, by the player who last cut the cards, or by the next person entitled to cut the cards, as determined by paragraph (c) (6) above.
- (8) If there is no gaming activity at a Best Hand Poker table which is open for gaming, the cards shall be removed from the dealing shoe and the discard rack, and spread out on the table for inspection, either face up or face down. If the cards are spread face down, they shall be turned face up once a player arrives at the table. After the first player is afforded an opportunity to visually inspect the cards, the cards shall be turned face downward on the table. The cards shall be mixed thoroughly by a Washing of the cards, stacked, then Shuffled and cut in accordance with this section.

(d) Rankings of cards and Hands.

- (1) Rank of Cards. The ranking of cards used in Best Hand Poker, in order of highest to lowest rank, shall be: Ace, King, Queen, Jack, 10, 9, 8, 7, 6, 5, 4, 3 and 2. An Ace may be used as the lowest ranked card to complete a straight flush or straight formed with a 2, 3, 4 and 5.

- (2) Hand Rankings. The permissible poker Hands at the game of "Best Poker Hand", in order of highest to lowest rank, shall be:
- a. Royal flush is a Hand consisting of an Ace, King, Queen, Jack and 10 of the same unit.
 - b. Straight flush is a Hand consisting of five cards of the same suit in consecutive ranking, with King, Queen, Jack, 10 and 9 being the highest straight flush and Ace, 2, 3, 4, and 5 being the lowest ranking straight flush.
 - c. Four-of-a-kind is a Hand consisting of four cards of the same rank regardless of suit, with four Aces being the highest ranking four-of-a-kind and four 2s being the lowest ranking four-of-a-kind.
 - d. Full house is a Hand consisting of three-of-a-kind and a pair, with three Aces and two Kings being the highest ranking full house and three 2s and two 3s being the lowest ranking full house.
 - e. Flush is a Hand consisting of five cards of the same suit.
 - f. Straight is a Hand consisting of five cards of consecutive rank, regardless of suit with an Ace, King, Queen, Jack and 10 being the highest ranking straight and Ace, 2, 3, 4 and 5 being the lowest ranking straight. An Ace may not be combined with any other sequence of cards for the purpose of

determining a winning straight Hand (i.e., Queen, King, Ace, 2, 3).

- g. Three-of-a-kind is a Hand consisting of three cards of the same rank regardless of suit, with three Aces being the highest ranking three-of-a-kind and three 2s being the lowest ranking three-of-a-kind.
- h. Two pairs is a Hand consisting of two pairs with two Aces and two Kings being the highest ranking two pair and two 3s and two 2s being the lowest ranking two pairs.
- i. One pair is a Hand consisting of two cards of the same rank, regardless of suit, with two Aces being the highest ranking pair and two 2s being the lowest ranking pair.

(e) Permissible wagers

- (1) All wagers at Best Hand Poker shall be made by placing gaming chips and, if applicable, a Match Play Coupon on the appropriate betting area of the Best Hand Poker Layout.
- (2) All wagers at Best Hand Poker shall be placed prior to the Dealer announcing and signaling with a Hand motion "No more bets."
- (3) The player(s) at the game of Best Hand Poker whose wager(s) were placed in the betting space containing the highest poker Hand ranking shall win and be paid off

according to the odds reflected in subdivision (g) below.

- (4) No wager shall be made, increased or withdrawn after the Dealer has announced "No more bets, " and making a visible hand motion indicating "no more bets" will be accepted.

(f) Procedure for dealing Best Hand Poker

- (1) After the cards have been thoroughly Shuffled and cut in accordance with the procedures contained in subdivision (c) above and all wagers have been made by players, five cards are dealt by the Dealer face up from the top of the deck to each of the ten betting spaces. All cards shall remain face up on the Layout until all losing wagers are collected and winning wagers paid. In the alternative, the Nation Gaming Operation may elect to deal one card at a time to each of the ten betting stations, repeating the process until each betting station has received five cards each.
- (2) The Dealer shall then place the two remaining cards in the discard rack.
- (3) The Dealer shall arrange the five cards in each of the ten betting spaces into the best poker Hand possible in accordance with the rankings of Hands contained in paragraph (d) (2) above and shall audibly announce the winning combination and Payout odds.
- (4) All losing wagers shall immediately be collected by the Dealer and placed in the table inventory container.

- (5) Winning wagers shall then be paid in accordance with the Payout odds contained in subdivision (g) below.
- (6) After paying all winning wagers, the Dealer shall immediately collect all of the cards dealt and place them together with the two remaining cards in the discard rack and wash, reshuffle and cut the cards consistent with the procedures in subdivision (c) above. Notwithstanding the foregoing, if the Nation Gaming Operation has opted to utilize a second, differently colored deck of cards Shuffled while the other deck is in use, the used deck may be taken out of play and Shuffled and replaced by the newly Shuffled second deck.
- (g) Payout odds. The Nation Gaming Operation shall pay off each winning wager at the game of Best Hand Poker at no less than the odds listed below:

<u>Highest Hand</u>	<u>Odds</u>
No pair	Even money
One pair	2 to 1
Two pairs	3 to 1
Three-of-a-kind	5 to 1
Straight	10 to 1
Flush	12 to 1

Full house	15 to 1
Four-of-a-kind	20 to 1
Straight flush	25 to 1
Royal flush	50 to 1

(h) Irregularities

A card found turned face upwards in the deck shall not be used in the game and shall be burned. If two or more cards are found face up in the deck, all cards dealt shall be collected. The cards shall be washed, Shuffled and cut in accordance with subdivision (c) above or replaced with an alternate deck in accordance with paragraph (f) (6) above before play is resumed.

(i) Minimum wagers and maximum wagers.

The Nation Gaming Operation shall determine the minimum and maximum wagers at each table. The amounts of the minimum and maximum wagers shall be conspicuously posted on a sign at each table.

5. **Blackjack**

- (a) Definitions. The following words and terms, when used in this section, shall have the following meanings unless the context clearly indicates otherwise.
- (1) "Blackjack" or "natural blackjack" shall mean an Ace and any card having a point value of 10 dealt as the initial two cards to a player or a Dealer except that this shall not include an Ace and a ten point value card dealt to a player who has split pairs in a manner consistent with subdivision (g) below.
 - (2) "Dealer" shall mean the gaming employee responsible for dealing the cards at a blackjack table.
 - (3) "Determinant card" shall mean the first card drawn for each round of play to determine from which side of the two compartment dealing shoe the cards for that Hand shall be dealt.
 - (4) "Double shoe" shall mean a dealing shoe that has two adjacent compartments in which cards are stacked separately and which permits cards to be dealt from only one compartment at any given time.
 - (5) "Hard Total" shall mean the total point count of a Hand which contains no Aces or which contains Aces that are each counted as 1 in value.
 - (6) "Soft Total" shall mean the total point count of a Hand containing an Ace when the Ace is counted as 11 in value.

(b) Equipment

- (1) Table. Blackjack shall be played at a table having on one side places for the players and on the opposite side a place for the Dealer. Each blackjack table shall have a Drop Box and a tip box attached to the Dealer's side of the gaming table in a location approved in writing by the SGA and the SGO.
- (2) Layout. The Layout for a blackjack table shall be approved in writing by the SGA and the SGO and shall contain, at a minimum:
 - a. The name or logo of the Nation Gaming Operation; and
 - b. Specific areas designated for the placement of wagers, which betting areas shall not exceed seven in number.
 - c. The following inscriptions:
 1. Blackjack pays 3 to 2.
 2. Dealer must draw to 16 and stand on all 17's; and
 3. Insurance pays 2 to 1.
- (3) Card reader device. A blackjack table may have attached to it, as approved in writing by the SGA and the SGO, a

card reader device which permits the Dealer to read his or her hole card in order to determine if the Dealer has a blackjack. If a blackjack table has an approved card reader device attached to it, the floorperson assigned to the table shall inspect the card reader device at the beginning of each gaming day. The purpose of this inspection shall be to insure that there has been no tampering with the device and that it is in proper working order.

- (4) Discard rack. In order to collect the cards at the conclusion of a round of play and at such other times as provided in the Compact or its Appendices, each blackjack table shall have a discard rack securely attached to the top of the Dealer's side of the table. The height of each discard rack shall equal the height of the cards, stacked one on top of the other, contained in the total number of decks that are to be used in the dealing shoe at that table; provided, however, that a taller discard rack may be used if such rack has a distinct and clearly visible mark on its side to show the exact height for a stack of cards equal to the total number of cards contained in the number of decks to be used in the dealing shoe at that table. Whenever a double shoe is used at a blackjack table, the same number of decks shall be used in each side of the double shoe, and the height and marking requirements as set forth above for the table's discard rack shall be determined from the number of decks used in one side of the shoe.
- (5) Automated card shuffling device (Optional) . An automated card shuffling device is a device which can automatically

perform a Shuffle. Such a device shall meet the requirements of Appendix B, Section 71.

(6) Cards; number of decks; value of cards

- a. Blackjack shall be played with at least one standard deck of cards, each of which shall meet the requirements of Appendix B, Section 69, with backs of the same color and design and one additional cutting card. The cutting card shall be opaque and in a solid color readily distinguishable from the color of the backs and edges of the playing cards, as approved in writing by the SGA and the SGO.
- b. The value of the cards contained in each deck shall be as follows:
 1. Any card from 2 to 10 shall have its face value;
 2. Any Jack, Queen or King shall have a value of 10;
 3. An Ace shall have a value of:
 - A. 11, unless that value would give a player or the Dealer a score in excess of 21, in which case, it shall have a value of one; or
 - B. 1.

- c. If a double shoe is utilized, blackjack shall be played with at least two decks of cards that shall be dealt from separate sides of the dealing shoe. The cards dealt from each side of the shoe shall have backs of the same color and design as all other cards being dealt from that side of the shoe. The backs of the cards being dealt from one side of the shoe, however, shall be of a different color than the backs being dealt from the other side. In addition to the playing cards used, a separate cutting card shall be used in each side of the shoe.

- d. If an automated card shuffling device is utilized, blackjack shall be played with at least two decks of cards in accordance with the following requirements:
 - 1. Each deck of cards shall meet the requirements of Appendix B, Section 69;
 - 2. The cards shall be separated into two batches, with an equal number of decks included in each batch;
 - 3. The backs of the cards in each batch shall be of the same color and design, but of a different color than the cards included in the other batch;
 - 4. One batch of cards shall be shuffled and stored in the automated card shuffling device

while the other batch is being dealt or used to play the game;

5. Both batches of cards shall be continuously alternated in and out of play, with each batch being used for every other dealing shoe; and
 6. The cards from only one batch shall be placed in the discard rack at any given time.
- e. All cards opened for use on a table and dealt from a manual or automated dealing shoe shall be changed at least once every eight hours. All cards opened for use on a table and dealt from the Hand shall be changed at least every four (4) hours.

(cl) Wagers

- (1) Prior to the first card being dealt for each round of play, each player at the game of blackjack shall make a wager against the Dealer which shall win if:
 - a. The score of the player is 21 or less and the score of the Dealer is in excess of 21; or
 - b. The score of the player exceeds that of the Dealer without either exceeding 21;
- (2) Except as otherwise provided in this section, no wager shall be made, increased or withdrawn after the first card of the respective round has been dealt.

- (3) All wagers at blackjack shall be made by placing gaming chips and, if applicable, a Match Play Coupon on the appropriate areas of the blackjack Layout.
- (4) After each round of play is complete, the Dealer shall collect all losing wagers and pay off all winning wagers. All winning wagers shall be paid at odds of 1 to 1, with the exception of a natural blackjack, which shall be paid at odds of 3 to 2. Notwithstanding any other provision of this subsection, the Nation Gaming Operation may, in its discretion, offer one or more of the following Payout odds for winning wagers:
 - a. Three cards consisting of the 6, 7 and 8 of the same suit shall be paid at odds of 2 to 1;
 - b. Three cards consisting of three 7's of any suit shall be paid at odds of 3 to 2;
 - c. A single natural blackjack combination consisting of a specific Ace and face card conspicuously posted by the Nation Gaming Operation shall be paid at odds of 2 to 1;
 - d. Five Cards totaling 21 shall be paid at odds of 2 to 1.
- (5) Once the first card of any round of play has been removed from the shoe by the Dealer, no player shall handle, remove or alter any wager(s) that has been made until a decision has been rendered and implemented with respect to that wager except as explicitly permitted by this

section.

- (6) Once a wager on the insurance line, a wager to double down or a wager to split pairs has been made and confirmed by the Dealer, no player shall handle, remove or alter such wager(s) until a decision has been rendered and implemented with respect to that wager except as explicitly permitted by this section.
- (7) The Nation Gaming Operation may implement any of the following options at a blackjack table:
 - a. Persons who have not made a wager on the first round of play may not enter the game on a subsequent round of play until a reshuffle of the cards has occurred;
 - b. Persons who have not made a wager on the first round of play may be permitted to enter the game, but may be limited to wagering only the minimum limit posted at the table until a reshuffle of the cards has occurred;
 - c. Persons who, after making a wager on a given round of play, decline to wager on any subsequent round of play may be precluded from placing any further wagers until a reshuffle of the cards has occurred; and
 - d. Persons who, after making a wager on a given round of play, decline to wager on any subsequent round of play may be permitted to place further wagers,

but may be limited to wagering only the minimum limit posted at the table until a reshuffle of the cards has occurred.

- (8) If the Nation Ga.ming Operation implements any of the options in paragraph (c) (7) above, the option shall be uniformly applied to all persons at that table; provided, however that if the Nation Gaming Operation has implemented either of the options in subparagraphs (c) (7) (c) or (c) (7) (d) above, an exception may be made

for a person who temporarily leaves the table if, at the time the person leaves, the Nation Gaming Operation agrees to reserve the person's spot until his or her return.

- (9) If a double shoe is utilized, the term "first card" as used in paragraphs (c) (2) and (c) (5) above shall mean "determinant card."

(d) Opening of a blackjack table for gaming

- (1) After receiving the one or more decks of cards at the table, the Dealer shall sort and inspect the face and backs of each deck of the face down cards separately and the floorperson assigned to the table shall verify the inspection.
- (2) After the cards are inspected, the cards shall be spread out face upwards on the table for visual inspection by the first player or players to arrive at the table. The cards shall be spread out in horizontal fan shaped columns by deck according to suit and in sequence. The

cards in each suit shall be laid out in sequence within the suit.

- (3) After the first player or players is afforded an opportunity to visually inspect the cards, the cards shall be turned face downward on the table, mixed thoroughly by a "Washing" of the cards and stacked.
 - (4) If a double shoe is utilized, all of the decks that comprise one side of the dealing shoe shall be spread for inspection on the table separately from the decks that comprise the other side of the dealing shoe. After the player(s) is afforded an opportunity to visually inspect the cards, the cards that comprise one side of the dealing shoe and the cards that comprise the other side of the dealing shoe shall separately be turned face downward on the table, mixed thoroughly by a "Washing" of the cards and stacked.
 - (5) If an automated shuffling device is utilized, all of the decks in one batch of cards shall be spread for inspection on the table separately from the decks in the other batch of cards. After the player(s) is afforded an opportunity to visually inspect the cards, each batch of cards shall separately be turned face downward on the table, washed and stacked.
- (e) Shuffle and cut of the cards
- (1) Immediately prior to commencement of play, after any round of play as may be required by the Nation Gaming Operation or SGA, and after each shoe of cards is dealt,

the Dealer shall Shuffle the cards so that they are randomly intermixed.

- (2) After the cards have been Shuffled, the Dealer shall offer the stack of cards, with backs facing away from him, to the players to be cut.
- (3) The player designated by paragraph (e) (5) below shall cut the cards by placing the cutting card in the stack at least 10 cards in from either end.
- (4) Once the cutting card has been inserted by the player, the Dealer shall take all cards in front of the cutting card and place them to the back of the stack. The Dealer shall then take the entire stack of cards that was just Shuffled and align them along the side of the dealing shoe. Thereafter, the Dealer shall insert the cutting card in the stack at a position approximately one-quarter of the way in from the back of the stack. The stack of cards shall then be inserted into the dealing shoe for commencement of play.
- (5) The player to cut the cards shall be:
 - a. The first player to the table if the game is just beginning;
 - b. The player on whose betting space the cutting card appeared during the last round of play;
 - c. The player at the farthest point to the right of the Dealer if the cutting card appeared on the

Dealer's Hand during the last round of play.

- d. The player at the farthest point to the right of the Dealer if the reshuffle was initiated at the discretion of the Nation Gaming Operation.
- (6) If the player designated in paragraph (e) (5) above refuses the cut, the cards shall be offered to each other player moving clockwise around the table until a player accepts the cut. If no player accepts the cut, the Dealer shall cut the cards.
 - (7) After the cards have been cut and before any cards have been dealt, a Gaming Facility Supervisor may require the cards to be recut if he or she determines that the cut was performed improperly or in any way that might affect the integrity or fairness of the game. If a recut is required, the cards shall be recut, at the Nation Gaming Operation's option, by the player who last cut the cards, or by the next person entitled to cut the cards, as determined by paragraph (e) (6) above.
 - (8) A reshuffle of the cards in the shoe shall take place after the cutting card is reached in the shoe except that the Nation Gaming Operation may determine after each round of play that the cards should be reshuffled.
 - (9) If there is no gaming activity at a blackjack table which is open for gaming, the cards shall be removed from the dealing shoe and the discard rack, and spread out on the table for inspection, either face up or face down. If the cards are spread face down, they may be turned face

up once a player arrives at the table. If the first. player is afforded an opportunity to visually inspect the cards, the cards shall thereafter be turned face downward on the table.

- a. If there is no automated shuffling device in use, the cards shall be mixed thoroughly by a Washing of the cards, stacked, then Shuffled and cut in accordance with this section.
- b. If an automated shuffling device is in use, the cards shall be washed, stacked and placed into the automated shuffling device to be Shuffled. The batch of cards already in the Shuffler shall then be removed. Unless a player so requests, the batch of cards removed from the Shuffler need not be spread for inspection and reshuffled prior to being dealt, if:
 1. The automated card shuffling device stores a single batch of Shuffled cards inside the Shuffler in a secure manner approved in writing by the SGA and the SGO; and
 2. The Shuffled cards have been secured, released and prepared for play in accordance with procedures approved in writing by the SGA.

- (10) The Nation Gaming Operation may submit to the SGA for approval in writing proposed Shuffle, cut card placement, number of cut cards (to include Shuffle techniques without the use of any cut cards), location of where the

Shuffle takes place, who is responsible for shuffling, shuffling equipment (dealing shoes or other dealing devices) and burn card procedures.

(f) Procedure for dealing the game of blackjack

- (1) All cards used to game at blackjack shall be dealt either from the Dealer's Hand or from a dealing shoe specifically designed for such purpose.
- (2) Each Dealer shall remove cards from the shoe with his or her left hand, turn them face upwards, and then place them on the appropriate area of the Layout with his or her right hand, except that the Dealer has the option to deal hit cards to the first two positions with his or her left hand.
- (3) After each full set of cards is placed in the shoe, the Dealer shall remove the first card therefrom face downwards and place it in the discard rack. Each new Dealer who comes to the table shall also burn one card as described herein before the new Dealer deals any cards to the players. The burn card shall be disclosed requested by the player.
- (4) If a double shoe is utilized, the following procedures shall be used in lieu of those set forth in paragraph (f) (3) above.
 - a. Prior to commencement of each round of play, the Dealer shall draw a card from either side of the double shoe. The suit of that card shall determine

from which side of the shoe that round of play will be dealt. The Nation Gaming Operation shall designate that the suits of hearts and diamonds shall correspond to the color of the backs of the cards being dealt from one side of the shoe, and that the suits of spades and clubs shall correspond to the color of the backs of the cards being dealt from the other side of the shoe.

- b. A determinant card corresponding to the side of the shoe from which it was drawn shall become the player's first card. A determinant card that does not correspond to the side of the shoe from which it was dealt shall be burned by placing it in a segregated area of the dealing shoe.
- (5) At the commencement of each round of play, or immediately after the determinant card has been drawn and either burned or used as the player's first card, the Dealer shall, starting on his left and continuing around the table, deal the cards in the following order:
- a. One card face upwards to each box on the Layout in which a wager is contained;
 - b. One card face upwards to himself or herself;
 - c. A second card face upwards to each box in which a wager is contained;
 - d. One card face down to himself or herself which shall be known as the "hole card."

- (6) The Nation Gaming Operation may offer blackjack dealt by hand rather than through employing the use of a shoe. In the instances where blackjack will be hand dealt:
- a. Dealers shall hold the deck in the same hand every round and shall not hold the deck in any way that might affect the integrity or fairness of the game;
 - b. Both cards initially dealt to each player shall be dealt face down;
 - c. Dealers shall only expose their hole card with that hand opposite which they hold the deck(s) of playing cards.
- (7) If the Dealer's first card is an Ace, King, Queen, Jack or 10, he or she shall determine whether the hole card will give the Dealer a natural blackjack prior to dealing any additional cards to the players at the table:
- a. If the Nation Gaming Operation elects to utilize a card reader device, the Dealer shall insert the hole card into the card reader device by moving the card face down on the Layout without exposing its value to anyone at the table, including the Dealer. If the Dealer has a natural blackjack, no additional cards shall be dealt and each player's wager shall be settled.
 - b. If the Nation Gaming Operation elects to deal the cards by hand, the Dealer shall determine the value of the hole card by discreetly "peeking" at the

card without exposing its value to any other person. If the Dealer has a natural blackjack, no additional cards shall be dealt and each player's wager shall be settled.

- (8) After two cards have been dealt to each player and the Dealer does not have a natural blackjack, the Dealer shall, beginning from his or her left, announce the point total of each player. As each player's point total is announced, such player shall indicate whether he wishes to surrender, double down, split pairs, stand or draw as provided for by this section.
- (9) As each player indicates his or her decision(s), the Dealer shall, except in hand dealt games, deal face upwards whatever additional cards are necessary to effectuate such decision consistent with this section and shall announce the new point total of such player's hand after each additional card is dealt.
- (10) After decisions of each player have been implemented and all additional cards have been dealt, the Dealer shall expose his or her hole card by turning it over with the fingers of the hand farthest from the dealing shoe, or in the case of games dealt by hand, with the fingers of the hand not holding the deck(s) of cards. Any additional cards required to be dealt to the Hand of the Dealer shall be dealt face up. After the Dealer's Hand has been completed, he or she shall announce their point count.
- (11) At the conclusion of a round of play, all cards still remaining on the Layout shall be picked up by the Dealer

in order and in such a way that they can be readily arranged to indicate each player's Hand in case of question or dispute. The Dealer shall pick up the cards beginning with those of the player to his far right and moving counterclockwise around the table. After all the players' cards have been collected the Dealer shall pick up his cards against the bottom of the players' cards and place them in the discard rack or in a segregated area of the double shoe.

- (12) Whenever the cutting card is reached in the deal of the cards, the Dealer shall continue dealing the cards until that round of play is completed after which the Dealer shall:
 - a. Collect the cards as provided in paragraph (f) (11) above;
 - b. Prepare to Shuffle the cards, as follows:
 1. Whenever a single dealing shoe is used, the Dealer shall remove the cards remaining in the shoe and place them in the discard rack to ensure that no cards are missing; or
 2. Whenever a double shoe is used, the Dealer shall remove the cards remaining in the side of the shoe from which the cutting card was drawn and the cards, if any, that were put in a separate segregated area for the discards from that side of the double shoe, after which the Dealer shall place those cards face down

in the discard rack in order to ensure that no cards are missing; and then

- c. Shuffle the cards. If a double shoe is utilized, the Shuffle of the cards shall be limited to the side of the shoe from which the cutting card was drawn.

(13) No player or spectator shall handle, remove or alter any cards used to game at blackjack except as explicitly permitted by this section and no Dealer or other gaming employee shall permit a player or spectator to engage in such activity.

(14) Each player at the table shall be responsible for correctly computing the point count of his or her Hand and no player shall rely on the point counts required to be announced by the Dealer under this section without himself or herself checking the accuracy of such announcement.

(g) Splitting pairs

(1) Whenever the initial two cards dealt to a player are identical in value, the player may elect to split the Hand into two separate Hands provided that he or she makes a wager on the second Hand so formed in an amount equal to their original wager.

(2) When a player splits pairs, the Dealer shall deal a card to and complete the player's decisions with respect to the first incomplete Hand on the Dealer's left before

proceeding to deal any cards to any other Hand.

- (3) After a second card is dealt to a split pair, the Dealer shall announce the point total of such Hand and the player shall indicate his decision to stand, draw or double down with respect thereto except that:
 - a. A player may not split pairs again if the second card so dealt is identical in value to a card of the split pair; and
 - b. A player splitting Aces shall have only one card dealt to each Ace and may not elect to receive additional cards.
- (4) Notwithstanding the provisions of subparagraph (g) (3) (a) above, the Nation Gaming Operation, upon written approval of the SGA, may permit a player to split pairs up to three times (a total of four Hands) at a blackjack table with up to six player boxes or twice (a total of three Hands) at a blackjack table with seven player boxes. If the Nation Gaming Operation elects to offer the option of splitting pairs more than once, it shall prohibit a player from splitting a pair of Aces more than once (a total of two Hands). All other requirements of this section shall apply to each Hand which is formed as a result of splitting pairs more than once.

(h) Doubling down

Except for a natural blackjack, a player may elect to double down, i.e., make an additional wager not in excess of the

amount of his original wager, on the first two cards dealt to him or the first two cards of any split pair on the condition that one and only one additional card shall be dealt to the Hand on which he has elected to double down. In such circumstances, the one additional card shall be dealt face upwards and placed sideways on the Layout, perpendicular to the two cards forming the Hand on which the player has elected to double down.

(i) Insurance wagers

- (1) Whenever the first card dealt to the Dealer is an Ace, each player shall have the right to make an insurance bet which wins if the Dealer's second card is a King, Queen, Jack or 10 and shall lose if the Dealer's second card is an Ace, 2, 3, 4, 5, 6, 7, 8, or 9.
- (2) An insurance bet may be made by placing on the insurance line of the Layout an amount not more than half the amount staked on the player's initial wager, except that a player may bet an amount in excess of half the initial wager to the next unit that can be wagered in chips when, because of the limitation of the value of chip denominations, half the initial wager cannot be bet. All insurance wagers shall be placed prior to the Dealer inserting his or her hole card into the card reader device or otherwise determining whether the Dealer's hole card is a King, Queen, Jack or 10.
- (3) All winning insurance wagers shall be paid at odds of 2 to 1.

- (4) All losing insurance wagers shall be collected by the Dealer immediately after he or she determines that the hole card is not a King, Queen, Jack or 10 in accordance with paragraph (f) (7) above.

- (j) Drawing of additional cards by players and Dealers
 - (1) A player may elect to draw additional cards whenever his or her point count total is less than 21 except that:
 - a. A player having a natural blackjack or a hard or soft total of 21 may not draw additional cards;
 - b. A player electing to double down shall draw one and only one additional card;
 - c. A player splitting Aces shall only have one card dealt to each Ace and shall not be permitted to receive additional cards.
 - (2) Except as provided in paragraph (j) (3) below, a Dealer shall draw additional cards to his Hand until he or she has a hard or soft total of 17, 18, 19, 20 or 21 at which point no additional cards shall be drawn.
 - (3) A Dealer shall draw no additional cards to his or her Hand, regardless of the point count, if decisions have been made on all players' Hands and the point count of the Dealer's Hand will have no effect on the outcome of the round of play.

- (k) Payment of natural blackjack

- (1) If the first face up card dealt to the Dealer is a 2, 3, 4, 5, 6, 7, 8, or 9 and a player has natural blackjack, the Dealer shall announce and pay the blackjack at odds of 3 to 2 and shall remove the player's cards before any player receives a third card.
- (2) If the first face up card dealt to the Dealer is an Ace, King, Queen, Jack or 10 and a player has Blackjack, the Dealer shall announce the Blackjack but shall make no payment until the Dealer checks his or her hole card in accordance with paragraph (f) (7) above. If, in such circumstances, the Dealer's hole card does not give him or her a natural blackjack, the player having blackjack shall be paid at odds of 3 to 2, and his or her cards shall be collected by the Dealer. If, however, the Dealer's hole card gives him or her blackjack, the wager of the player having Blackjack shall be void and constitute a push or stand off.

(1) Irregularities

- (1) A card found turned face upwards in the shoe shall not be used in the game and shall be burned by placing it in the discard rack or in a segregated area of the double shoe.
- (2) A card drawn in error without its face being exposed shall be used as though it were the next card drawn from the shoe.
- (3) After the initial two cards have been dealt to each player and the Dealer and a card is drawn in error and exposed to the players, such card shall be dealt to the

players or Dealer as though it were the next card draw from the shoe. Any player refusing to accept such card shall not have any additional cards dealt to him during such round. If the card is refused by the player(s) and the Dealer cannot use the card, the card shall be burned by placing it in the discard rack or in a segregated area of the double shoe.

- (4) If the Dealer has a hard or soft 17, 18, 19, 20 or 21 and accidentally draws a card for himself or herself, such card shall be burned by placing it in the discard rack or in a segregated area of the double shoe.
- (5) If the Dealer misses dealing the first or second card to himself or herself, the Dealer shall continue dealing the first two cards to each player, and then shall deal the appropriate number of cards to himself or herself.
- (6) If there are insufficient cards remaining in the shoe to complete a round of play, all of the cards in the discard rack or in a segregated area of the double shoe shall be Shuffled and cut. The first card shall then be drawn face downwards and burned, by placing it in the discard rack or in a segregated area of the double shoe, and the Dealer shall complete the round of play. Thereafter, play shall continue with the shoe.
- (7) If no cards are dealt to the player's Hand, the Hand shall be declared dead and the player shall be included in the next deal. If only one card is dealt to the player's Hand, at the player's option, the Dealer shall deal the second card to the player after all other

players have received a second card.

- (8) Any round of play drawn from the inappropriate side of a double shoe shall be treated as if it were drawn from the appropriate side of the shoe and concluded.
- (9) If after receiving the first two cards the Dealer fails to deal an additional card(s) to a player who has requested such a card, then, at the player's option, the Dealer shall either deal the additional card(s) after all other players have received their additional cards but prior to the Dealer revealing his or her hole card, or call the player's Hand dead, return the player's original wager and burn the player's cards by placing them in the discard rack or in a segregated area of the double shoe.
- (10) If the Dealer inserts his or her hole card into a card reader device when the value of his or her first card is not an Ace, King, Queen, Jack or 10, the Dealer, after notification to a Gaming Facility Supervisor, shall:
 - a. If the particular card reader device in use provides the Dealer or any player with the opportunity to determine the value of the hole card, call all Hands dead, collect the cards and return each player's wager; or
 - b. If the particular card reader device in use does not provide the Dealer or any player with the opportunity to determine the value of the hole card, continue play.

(m) Minimum wagers and maximum wagers

The Nation Gaming Operation shall determine the minimum and maximum wagers at each table. The amounts of the minimum and maximum wagers shall be conspicuously posted on a sign at each table.

(n) Super Sevens wager. The Nation Gaming Operation may, at its discretion, opt to provide a Super Sevens bet as an additional wager in the game Blackjack.

(1) A patron shall make a wager on the underlying game of blackjack before placing a wager on Super Sevens, although the outcome of the Super Sevens bet has no effect on the outcome of the blackjack game. The minimum and maximum limits for each Super Seven wager shall be established by the Nation gaming Operation and posted at the table.

(2) All Super Sevens bets shall be placed in the designated spot on the Layout prior to the first card being dealt.

(3) Except for the additional wager on Super Sevens, the play of the underlying Blackjack game shall proceed in accordance with the standards contained in this section.

(4) If a patron splits the first two sevens he or she receives for purposes of the underlying blackjack game, only the "two sevens" Payout applicable under subsection 7 (b) or (c) below shall be paid.

(5) A Super Sevens wager loses and shall be collected by the

Dealer if a seven is not dealt as the first card in any round of play.

- (6) In the case of a Dealer Blackjack, the player shall receive a third card if the first two cards dealt to the player are sevens.
- (7) Unless otherwise approved in writing by the SGA, the following constitute the winning Hands and Payouts for Super Sevens:
 - a. A patron who receives a seven as the first card and who receives no other seven shall be paid 3 to 1 odds.
 - b. A patron who receives two sevens of different suits on the first two cards dealt shall be paid 50 to 1 odds.
 - c. A patron who receives two sevens of the same suit on the first two cards dealt shall be paid 100 to 1 odds.
 - d. A patron who receives three sevens of different suits on the first three cards dealt shall be paid 500 to 1 odds.
 - e. A patron who receives three sevens of the same suit on the first three cards dealt shall be paid 5,000 to 1 odds.

(o) Progressive Super Sevens Jackpot Wager. The Nation Gaming

Operation may, at its discretion, opt to provide a Super Sevens Progressive Jackpot bet as an additional wager in the game Blackjack.

(1) General provisions.

- a. A Progressive Super Sevens Jackpot wager, the amount of which shall be established by the Nation Gaming Operation, shall be made in the designated betting space or coin slot on the Layout prior to the commencement of a round of play, provided that the player has also made a wager equal to at least the table minimum on a Hand in the underlying Blackjack game. Each Progressive Super Sevens Jackpot wager shall increase the game's progressive jackpot meter and entitle a bettor to win that progressive jackpot prize upon obtaining a Hand comprised of three sevens of the same suit. No Progressive Super Sevens Jackpot wager shall be accepted after a card has been dealt in the underlying Blackjack game.
- b. The amount of the initial Progressive Super Sevens Jackpot prize, which shall be established by the Nation Gaming Operation, shall be reset to that amount following each Progressive Super Sevens Jackpot Payout.
- c. The Progressive Super Sevens Jackpot shall be augmented upon each wager in increments established by the Nation Gaming Operation and approved in writing by the SGA, regardless of the outcome of

the Progressive Super Sevens Jackpot wager.

(2) Wagers.

- a. When all wagers have been made, including Progressive Super sevens Jackpot wagers, but before the Dealer begins to deal the cards in the underlying Blackjack game, the Dealer shall announce "No more bets" in a tone of voice to be heard by all players at the table. Simultaneously with that announcement, the Dealer shall activate the Progressive Super Sevens Jackpot Wager lock-out feature by depressing the Coin-In button.
- b. Notwithstanding the provisions of a. above, if the Nation Gaming Operation's approved system of internal controls permit a Dealer to accept a Progressive Super Sevens Jackpot wager after the Coin-In button has been activated but before any cards in the underlying Blackjack game have been dealt, the player's wager shall be placed upon on top of, but not in, the Progressive Super Sevens Jackpot coin slot. At the end of that round of play, that wager shall be deposited into the table's gaming cheque rack and not into the Progressive Super Sevens Jackpot coin slot.

(3) Procedures for dealing

- a. When a Blackjack Dealer is dealt a Blackjack, each player enrolled in the Progressive Super Sevens Jackpot game at that table who has been dealt two

sevens shall be dealt a third card.

- b. If a player opts to split two sevens in the underlying Blackjack game and a third seven is dealt to that player, only the "two sevens" Payout applicable in subsection (d) (1) or (2) below shall be paid.
- c. A Progressive Super Sevens Jackpot wager shall lose and be collected by the Dealer when:
 - 1. The first card dealt to a player is not a seven.
 - 2. The first card dealt to a player is a seven, but the second card dealt is not a seven.
- d. A Progressive Super Sevens Jackpot wager shall win if:
 - 1. A patron who receives two sevens of different suits on the first two cards dealt shall be paid 25 to 1 odds.
 - 2. A patron who receives two sevens of the same suit on the first two cards dealt shall be paid 50 to 1 odds.
 - 3. A patron who receives three sevens of different suits on the first three cards dealt shall be paid 500 to 1 odds.

4. A patron who receives three sevens of the same suit on the first three cards dealt shall win the Progressive Super Sevens Jackpot provided no other player at the same table has three sevens of the same suit during that round. If one or more other players at the same table have three sevens of the same suit in the same round, such players shall equally split the Progressive Super Sevens Jackpot.
- e. When a player has a Progressive Super Sevens Jackpot Hand comprised of three sevens of the same suit:
 1. The Pit manager shall notify the surveillance department and an assistant gaming facility manager; and
 2. The Pit manager shall inset the jackpot key into the jackpot computer, verify the amount of the Payout to the winning player (s) and secure the key in accordance with the Nation Gaming Operation's approved system of internal control.
 - f. Upon completion of each round of play, the Dealer shall depress the Game Over button and commence a new round of play.

(4) Progressive Super Sevens Jackpot Wager Irregularities

- a. If the player is offered the opportunity by the Nation Gaming Operation to back out of a Hand and withdraw their wager due to a Dealer's error, that player's Progressive Super Sevens Jackpot wager shall not be withdrawn unless the Dealer's error directly affected the proper dealing sequence of the first two cards dealt to that player.
- b. If the Dealer in the underlying Blackjack game fails to depress the Progressive Super Sevens Jackpot Game Over button prior to commencing the dealing of a subsequent Hand, the Dealer shall summon a floorperson who shall correct the error in accordance with the Nation Gaming Operation's approved system of internal controls and activate a new game.
- c. If a dealer in the underlying Blackjack game fails to depress the Progressive Super Sevens Jackpot Coin-In button prior to commencing the dealing of a subsequent Hand, the Dealer shall summon a floorperson who shall correct the error in accordance with the Nation Gaming Operation's approved system of internal controls, and activate a new game.
- d. If the Dealer in the underlying Blackjack game accidentally presses a Progressive Super Sevens Jackpot jackpot button and activates a jackpot feature, the Dealer shall summon a floorperson who shall correct the error in accordance with the Nation Gaming Operation's approved system of

internal controls, and activate a new game.

- e. If a player places a Progressive Super Sevens Jackpot wager in an amount exceeding the maximum for such wagers established by the Nation Gaming Operation and posted at that table, the amount exceeding the posted maximum wager shall be returned to that player.

- f. If the device that records the placement of Progressive Super Sevens Jackpot wagers is malfunctioning or is otherwise disabled, no Super Sevens Progressive Jackpot wager shall be accepted until the SGA has determined that the device has been restored to its proper working order. The Nation Gaming Operation may, at its discretion, continue to operate the underlying Blackjack game at that table.

- g. If a Dealer errs and does not deal a complete Hand to a player who has placed a Progressive Super Sevens Jackpot wager, that Super Sevens Progressive Jackpot wager and the underlying Blackjack Hand dealt to that player shall be declared "dead" by the Dealer. If that player elects not to participate in the Progressive Super Sevens Jackpot on the next round of play, the Dealer shall return that player's wager on the "dead" Hand from the table's gaming cheque rack.

6. Caribbean Stud Poker

- (a) Definitions. The following words and terms, when used in this section, shall have the following meanings unless the context clearly indicates otherwise:
- (1) "Ante wager" means the initial wager placed by a player prior to any cards being dealt entitling that player to participate in the next round of play.
 - (2) "Bet wager" means an additional wager made by a player, in an amount double the player's Ante wager, after all cards for the round of play have been dealt but before the Dealer's hole cards are exposed.
 - (3) "Fold" means the withdrawal of a player from a round of play by discarding his or her Hand of cards after all cards have been dealt but prior to placing a Bet wager.
 - (4) "Hand" means the five card Hand dealt to each player and the Dealer.
 - (5) "Hole card" means any of the four cards which are dealt face down to the Dealer.
 - (6) "Progressive Payout Hand" means a flush, full house, four-of-a-kind, straight flush or royal flush.
 - (7) "Push" means a tie or a stand-off.
 - (8) "Qualifying Hand" means a Dealer's Hand with a rank of Ace, King, 4, 3 and 2 or better.

- (9) "Rank" or "ranking" means the relative position of a card or group of cards.
 - (10) "Round of play" or "round" means one complete cycle of play during which all players wagering at the table have been dealt a Hand, have folded or wagered upon it, and have had their wagers paid off or collected in accordance with this section.
 - (11) "Stub" means the remaining portion of the deck after all cards in the round of play have been dealt.
 - (12) "Suit" means one of the four categories of cards: club, diamond, heart or spade, with no suit being higher in rank than another.
- (b) Equipment.
- (1) Table. Caribbean Stud Poker shall be played at a table having on one side places for the players and on the opposite side a place for the Dealer. Each Caribbean Stud Poker table shall have a Drop Box and a tip box attached to it on the Dealer's side of the gaming table, in a location approved in writing by the SGA and the SGO.
 - (2) Layout. The Layout for a Caribbean Stud Poker table shall be approved in writing by the SGA and the SGO and shall contain, at a minimum:
 - a. The name or logo of the Nation Gaming Operation; and
 - b. Specific areas designated for the placement of

wagers, which betting areas shall not exceed seven in number.

- (3) Discard rack. In order to collect the cards at the conclusion of a round of play and at such other times as provided in the Compact and its Appendices, each Caribbean Stud Poker table shall have a discard rack securely attached to the top of the Dealer's side of the table. The height of each discard rack shall equal the height of the cards, stacked one on top of the other, contained in one decks; provided, however, that a taller discard rack may be used if such rack has a distinct and clearly visible mark on its side to show the exact height for a stack of cards equal to the total number of cards contained in one deck.
- (4) Automated card shuffling device (Optional) . An automated card shuffling device is a device which can automatically perform a Shuffle. Such a device shall meet the requirements of Appendix B, Section 71.
- (5) Display boards reflecting the amount of the Progressive Jackpot.
- (6) Meters recording the amount of the Progressive Jackpot.
- (7) Cards; number of decks
 - a. Except as provided in subparagraph (b) (7) (b) below, Caribbean Stud Poker shall be played with one deck of cards with backs of the same color and design, one additional cutting card and one additional

cover card. The cutting card and cover card shall be opaque and in a solid color readily distinguishable from the color of the backs and edges of the playing cards, as approved in writing by the SGA and the SGO. The deck of cards shall meet the requirements of Appendix B, Section 69.

b. If an automated card shuffling device is used, the Nation Gaming Operation shall be permitted to use a second deck of cards to play the game, provided that:

1. Each deck of cards complies with the requirements of subparagraph (b) (7) (a) above;
2. The backs of the cards in the two decks are of different color;
3. One deck is being Shuffled by the automated card shuffling device while the other deck is being dealt or used to play the game;
4. Both decks are continuously alternated in and out of play, with each deck being used for every other round of play; and
5. The cards from only one deck shall be placed *in* the discard rack at any given time.

(c) Opening of the table for gaming

- (1) After receiving a deck of cards at the table, the Dealer

shall sort and inspect the cards, and the floorperson assigned to the table shall visually verify that inspection.

- (2) Following the inspection of the cards by the Dealer and the verification by the floorperson assigned to the table, the cards shall be spread out face up on the table for visual inspection by the first player to arrive at the table. The cards shall be spread out in new deck order according to suit and in sequence.
- (3) After the first player is afforded an opportunity to visually inspect the cards, the cards shall be turned face down on the table, mixed thoroughly by a "Washing" of the cards and stacked. Once the cards have been stacked, they shall be Shuffled.
- (4) If the Nation Gaming Operation uses an automated card shuffling device to play the game and two decks of cards are received at the table, each deck of cards shall be separately sorted, inspected, verified, spread, inspected, mixed, stacked and Shuffled in accordance with the provisions of paragraphs (c) (1) through (c) (3) above.
- (5) All cards opened for use on a table and dealt from a manual or automated dealing shoe shall be changed at least once every eight hours. All cards opened for use on a table and dealt from the Hand shall be changed at least every four hours.

(d) Shuffle and cut of the cards

- (1) Immediately prior to the commencement of play and after each round of play has been completed, the Dealer shall Shuffle the cards, either manually or by use of an automated card shuffling device approved in writing by the SGA and SGO, so that the cards are randomly intermixed. Upon completion of the Shuffle, the Dealer or device shall place the deck of cards in a single stack; provided, however, that nothing in this section shall be deemed to prohibit the use of an automated card shuffling device which, upon completion of the shuffling of the cards, inserts the stack of cards directly into a dealing shoe.

- (2) After the cards have been Shuffled and stacked, the Dealer shall:
 - a. If the cards were Shuffled using an automated card shuffling device, deal or deliver the cards; or
 - b. If the cards were Shuffled manually, cut the cards in accordance with the procedures set forth in paragraph (3) below.

- (3) If a cut of the cards is required, the Dealer shall:
 - a. Cut the deck, using one Hand, by:
 1. Placing the cover card on the table in front of the deck of cards;
 2. Taking a stack of at least 10 cards from the top of the deck and placing them on top of the

cover card;

3. Placing the cards remaining in the deck on top of the stack of cards that were cut and placed on the cover card pursuant to clause (d) (3) (a) (2) above; and
4. Removing the cover card and placing it *in* the discard rack; and

b. Deal the cards.

- (4) Notwithstanding paragraph (d) (3) above, after the cards have been cut but before any cards have been dealt, a Gaming Facility Supervisor may require the cards to be recut if he or she determines that the cut was performed improperly or in any way that might affect the integrity or fairness of the game.
- (5) Whenever there is no gaming activity at a Caribbean Stud Poker table which is open for gaming, the cards shall be spread out on the table either face up or face down. If the cards are spread face down, they shall be turned face up once a player arrives at the table. After the first player is afforded an opportunity to visually inspect the cards, the procedures outlined in paragraphs (d) (3) and (3) above shall be completed.

(e) Caribbean Stud Poker rankings

- (1) The rank of the cards used in Caribbean Stud Poker, for the determination of winning Hands, in order of highest

to lowest rank, shall be: Ace, King, Queen, Jack, 10, 9, 8, 7, 6, 5, 4, 3 and 2. Notwithstanding the foregoing, an Ace may be used to complete a "straight flush" or "straight" formed with a 2, 3, 4 and 5.

(2) The permissible poker Hands at the game of Caribbean Stud

Poker, in order of highest to lowest rank, shall be:

- a. "Royal flush" is a Hand consisting of an Ace, King, Queen, Jack and 10 of the same suit;
- b. "Straight flush" is a Hand consisting of five cards of the same suit in consecutive ranking, with King, Queen, Jack, 10 and 9 being the highest ranking straight flush and Ace, 2, 3, 4 and 5 being the lowest ranking straight flush;
- c. "Four-of-a-kind" is a Hand consisting of four cards of the same rank, with four Aces being the highest ranking four-of-a-kind and four 2's being the lowest ranking four-of-a-kind;
- d. "Full house" is a Hand consisting of "three-of-a-kind" and a "pair," with three Aces and two Kings being the highest ranking full house and three 2's and two 3's being the lowest ranking full house;
- e. "Flush" is a Hand consisting of five cards of the same suit;
- f. "Straight" is a Hand consisting of five cards of consecutive rank, regardless of suit, with an Ace,

King, Queen, Jack and 10 being the highest ranking straight and an Ace, 2, 3, 4 and 5 being the lowest ranking straight; provided, however, that an Ace may not be combined with any other sequence of cards for purposes of determining a winning Hand (for example, Queen, King, Ace, 2, 3);

- g. "Three-of-a-kind" is a Hand consisting of three cards of the same rank, with three Aces being the highest ranking three-of-a-kind and three 2's being the lowest ranking three-of-a-kind;
- h. "Two pairs" is a Hand containing two "pairs," with two Aces and two Kings being the highest ranking two pairs and two 3's and two 2's being the lowest ranking two pairs; and
- i. "One pair" is a Hand containing two cards of the same rank, with two Aces being the highest ranking pair and two 2's being the lowest rank pair.

- (3) When comparing a Dealer's and player's Hands which are of identical poker Hand rank pursuant to the provisions of this section, or which contain none of the Hands authorized in this section, the Hand which contains the highest ranking card as provided in paragraph (e) (1) above which is not contained in the other Hand shall be considered the higher ranking Hand. If the Hands are of identical rank after the application of this subdivision, the Hands shall be considered a push or a stand off.

(f) Wagers

- (1) All wagers at Caribbean Stud Poker shall be made by placing gaming chips and, if applicable, a Match Play Coupon on the appropriate betting areas of the table Layout. Oral wagers shall not be accepted.
 - (2) All Ante wagers shall be placed prior to the Dealer announcing "No more bets." Except as otherwise provided herein, no wager shall be made, increased, or withdrawn after the Dealer has announced "No more bets."
 - (3) Upon placing an ante wager, a player may, at his or her discretion, place a progressive Payout wager either by depositing a \$1.00 gaming chip into the acceptor device designated for that player or by redeeming a progressive wager coupon. Each player shall be responsible for verifying that his or her respective acceptor light has been properly illuminated.
 - (4) A "Bet" wager shall be made in accordance with subdivision (h) below.
 - (5) A player shall not be permitted to play more than one Hand per round of play.
 - (6) Only players who are seated at the Caribbean Stud Poker table may place a wager at the game. Once a player has placed a wager and received cards, that player must remain seated until the completion of that round of play.
- (g) Procedures for dealing Caribbean Stud Poker
- (1) Procedure for dealing the cards from a manual dealing

shoe

- a. If the Nation Gaming Operation chooses to have the cards dealt from a manual dealing shoe, the dealing shoe shall meet the requirements of Appendix B, Section 71. Once the Shuffle and cut have been completed, the stacked deck of cards shall be placed in the dealing shoe either by the Dealer or by an automatic shuffling device.
- b. Prior to dealing the cards and once all Ante and progressive Payout wagers have been placed, the Dealer shall then announce "No more bets" and press the "lock-out" button on the table controller panel. Once the "lock-out" button has been pressed, and only if any wagers have been placed on the progressive wager, the Dealer shall remove these wagers from the table inventory return device, and on the Layout in front of the table inventory container, verify that the number of gaming chips wagered equals the number of lights illuminated on the acceptor devices, and place the gaming chips into the table inventory container.
- c. Each card shall be removed from the dealing shoe with the Hand of the Dealer that is closest to the dealing shoe and placed on the appropriate area of the Layout with the opposite Hand.
- d. The Dealer shall, starting with the player farthest to his or her left and continuing around the table in a clockwise manner, deal the cards as follows:

1. One card face down to each player;
 2. One card face up to an area directly in front of the table inventory container designated for the Dealer's Hand;
 3. A second card face down to each player directly on top of that player's first card;
 4. A second card face down to the Dealer to the right of the Dealer's first card dealt face up; and
 5. A third, fourth and fifth card, in succession, face down to each player and the Dealer directly on top of the preceding card dealt face down.
- e. After five cards have been dealt to each player and the area designated for the Hand of the Dealer, the Dealer shall remove the Stub from the manual dealing shoe and, except as provided in subparagraph (g) (1) (f) below, place the Stub in the discard rack without exposing the cards.
- f. The Dealer shall be required to count the Stub at least once every five rounds of play in order to determine that the correct number of cards are still present in the deck. The Dealer shall determine the number of cards in the Stub by counting the cards face down on the Layout.

1. If the count of the Stub indicates that 52 cards are in the deck, the Dealer shall place the Stub in the discard rack without exposing the cards.
2. If the count of the Stub indicates that the number of cards in the deck is incorrect, the Dealer shall determine if the cards were misdealt. If the cards have been misdealt (a player or the area designed for the placement of the Dealer's Hand has more or less than five cards) but 52 cards remain in the deck, all Hands shall be void. If the cards have not been misdealt, all Hands shall be considered void and the entire deck of cards shall be removed from the table.

(2) Procedures for dealing the cards from the Hand

- a. The Nation Gaming Operation may, in its discretion, permit a Dealer to deal the cards used to play Caribbean Stud Poker from his or her Hand.
- b. If the Nation Gaming Operation chooses to have the cards dealt from the Dealer's Hand, the following requirements shall be observed:
 1. The Nation Gaming Operation shall use an automated shuffling device to Shuffle the cards.
 2. Once the Shuffle and cut have been completed,

the Dealer shall place the stacked deck of cards in either hand.

- A. Once the Dealer has chosen the hand in which he or she will hold the cards, the Dealer shall use that hand exclusively whenever holding the cards during that round of play.
 - B. The cards held by the Dealer shall at all times be kept in front of the Dealer and over the table inventory container.
3. The Dealer shall announce "No more bets" and press the lock-out button prior to dealing any cards. The Dealer shall deal each card by holding the deck of cards in the chosen hand and using the other hand to remove the top card of the deck in accordance with subparagraph (g) (2) (c) below.
- c. The Dealer shall, starting with the player farthest to his or her left and continuing around the table in a clockwise manner, deal the cards as follows:
- 1. One card face down to each player;
 - 2. One card face up to an area directly in front of the table inventory container designated for the Dealer's Hand;
 - 3. A second card face down to each player

directly on top of that player's first card;

4. A second card face down to the Dealer to the right of the Dealer's first card dealt face up; and
 5. A third, fourth and fifth card face down to each player and the Dealer, in succession, directly on top of the preceding card dealt face down.
- d. After five cards have been dealt to each player and the area designated for the placement of the Dealer's Hand, the Dealer shall, except as provided in subparagraph (g) (2) (e) below, place the Stub in the discard rack without exposing the cards.
 - e. The Dealer shall be required to count the Stub at least once every five rounds of play in order to determine that the correct number of cards are still present in the deck.
 - f. Notwithstanding the provisions of subparagraph (g) (2) (e) above, the counting of the Stub shall not be required if an automated card shuffling device is used that counts the number of cards in the deck after the completion of each Shuffle and indicates whether 52 cards are still present. If the automated card shuffling device reveals that an incorrect number of cards are present, the deck shall be removed from the table.

- (3) Procedures for dealing the cards from an automated dealing shoe.
- a. The Nation Gaming Operation may, in its discretion, choose to have the cards used to play Caribbean Stud Poker dealt from an automated dealing shoe which dispenses cards in stacks of five cards.
 - b. If the Nation Gaming Operation chooses to have the cards dealt from an automated dealing shoe, the following requirements shall be observed:
 1. Once the Shuffle and cut have been completed, the cards shall be placed in the automated dealing shoe.
 2. The Dealer shall then announce "No more bets" and press the lock-out button.
 - c. The Dealer shall deliver the first stack of cards dispensed by the automated dealing shoe face down to the player farthest to his or her left who has placed a wager. As the remaining stacks are dispensed to the Dealer by the automated dealing shoe, the Dealer shall, moving clockwise around the table, deliver a stack face down to each of the other players who has placed a wager. The Dealer shall then deliver a stack of five cards face down to the area designated for the Dealer's Hand.
 - d. After each stack of five cards has been dispensed and delivered in accordance with this subsection,

the Dealer shall remove the Stub from the automated dealing shoe and, except as provided in subparagraph (g) (3) (e) below, place the cards in the discard rack without exposing the cards.

e. The Dealer shall be required to count the Stub at least once every five rounds of play in order to determine that the correct number of cards are still present in the deck in accordance with subparagraph (g)(3)(f) above.

f. Notwithstanding the provisions of subparagraph (g) (3) (e) above, the counting of the Stub shall not be required if an automated card shuffling device is used that counts the number of cards in the deck after the completion of each Shuffle and indicates whether 52 cards are still present. If the automated card shuffling device reveals that an incorrect number of cards are present, the deck shall be removed from the table.

g. The stack of five cards comprising the Dealer's Hand shall then be spread in a row directly in front of the table inventory container with the top card to the Dealer's right and the bottom card to the Dealer's left. The Dealer shall then expose the bottom card of the Dealer's Hand, or that card farthest to the Dealer's left, and the round of play shall proceed.

(h) Bet wagers; procedure for completion of each round of play; collection and payment of wagers

- (1) After the dealing procedures have been completed but before the Dealer exposes the hole cards, each player shall, after examining his or her cards, either place a Bet wager in the designated betting area or fold and forfeit the Ante wager. If a player folds, the entire Ante wager shall be collected by the Dealer and placed in the table inventory container. A folded Hand shall then be immediately collected by the Dealer and placed in the discard rack.
- (2) Each player who makes a Bet wager shall be responsible for his or her own Hand and no person other than the Dealer may touch the cards of that player. Each player shall be required to keep the five cards above the table and in full view of the Dealer at all times. Once each player has examined his or her cards and placed the five cards face down on the appropriate area of the Layout, no player shall touch the cards again.
- (3) No player may exchange or communicate information regarding his or her Hand prior to the Dealer revealing the hole cards. A violation shall result in a forfeiture of all wagers on that round by the players exchanging or communicating information.
- (4) After all players have either placed a Bet wager or folded, the Dealer shall turn over and reveal the Dealer's hole cards and set the highest ranking poker Hand.
- (5) Except as otherwise provided in paragraph (h) (7) below after the hole cards are revealed, the Dealer shall,

starting with the player farthest to his or her right, turn the player's cards face up and if the Dealer has a qualifying Hand:

- a. All losing wagers shall immediately be collected by the Dealer and placed in the table inventory container. All losing Hands shall then be immediately collected by the Dealer and placed face down in the discard rack. Ante and Bet wagers made by a player shall lose if the qualifying Hand of the Dealer has a Hand rank which is higher than the Hand of that player.
- b. If the Hand of the player ties with that of the Dealer's qualifying Hand, the Hand of that player shall be a push. The Dealer shall not collect or pay the wagers, but shall immediately collect the cards of that player after all losing wagers and Hands have been collected.
- c. After all losing wagers and pushes have been settled, all winning wagers shall be paid. All winning Hands shall remain face up on the Layout until all winning Ante, Bet wagers and, if applicable, progressive Payout wagers are paid. Winning wagers shall be paid in accordance with the Payout odds listed in paragraph (j) (3) below. The Dealer shall pay all winning wagers beginning with the player farthest to the right of the Dealer and continuing counterclockwise around the table. A wager made by a player shall win if the Hand of the player has a ranking higher than that of the

Dealer's qualifying Hand. After paying all winning Ante and Bet wagers, the Dealer shall immediately collect the cards of all winning players and place them in the discard rack, together with the remaining cards in the deck used for that round of play; provided, however, that if a player has won a progressive Payout which is not being paid from the table inventory container, the cards of that player shall remain face up on the table until the necessary documentation has been completed.

- (6) Except as provided in paragraph (h) (7) below, after the hole cards are revealed, if the Dealer does not have a qualifying Hand:
- a. It shall be the option of the Nation Gaming Operation whether or not the Dealer shall turn the player's cards face up. If the Nation Gaming Operation elects not to turn over all the player's cards, the Dealer shall be required to turn over the cards of any player who has made a progressive wager;
 - b. The Dealer shall immediately announce "No Hand" and shall pay all Ante wagers at Payout odds of 1 to 1, beginning with the player farthest to the right of the Dealer and continuing counterclockwise around the table;
 - c. All Bet wagers shall be considered void and the Dealer shall neither collect nor pay said wagers; and

- d. After paying all Ante wagers, the Dealer shall immediately collect the cards of all players and place them in the discard rack, together with the remaining cards in the deck used for the round of play; provided, however, that if a player has won a progressive Payout which is not being paid from the table inventory container, the cards of that player shall not be collected until the necessary documentation has been completed.
- (7) All cards collected by the Dealer shall be picked up in order and placed in the discard rack in such a way that they can be readily arranged to reconstruct each Hand in the event of a question or dispute.
- (i) Progressive Payout
- (1) A progressive Payout wager shall be paid pursuant to the Payout table listed below, the procedures contained in Appendix B, Section 45 and prior to the collection of the cards by the Dealer.
 - (2) Prior to paying a progressive Payout Hand, the Dealer shall:
 - a. Verify that the Hand is a winning Hand;
 - b. Verify that the appropriate light on the acceptor device has been illuminated; and
 - c. Have a Gaming Facility Supervisor validate the progressive Payout pursuant to the approved system

of internal controls.

- (3) A winning progressive Payout wager shall be paid irrespective of the rank of the Hand of the Dealer, even if the Dealer does not have a qualifying Hand or has a higher ranking Hand than the player.

(j) Payout odds; rate of progression; Payout limitation

- (1) The Payout odds for winning wagers at Caribbean Stud Poker printed on any Layout or in any brochure or other publication distributed by the Nation Gaming Operation shall be stated through the use of the word "to" or "win," and no odds shall be stated through the use of the word "for."
- (2) The Nation Gaming Operation shall pay out winning Ante wagers at Payout odds of 1 to 1.
- (3) Subject to the Payout limitation in paragraph (j) (4) below, the Nation Gaming Operation shall pay off each winning Bet wager at the game of Caribbean Stud Poker at no less than the odds listed below:

<u>Wager</u>	<u>Payout Odds</u>
Royal Flush	100 to 1
Straight Flush	50 to 1
Four-of-a-kind	20 to 1

Full House	7 to 1
Flush	5 to 1
Straight	4 to 1
Three-of-a-kind	3 to 1
Two Pair	2 to 1
One Pair or less	1 to 1

(4) Notwithstanding the Payout odds in paragraph (j) (3) above, the Payout limit on each Bet wager for any Hand shall be \$5,000.

(5) The Nation Gaming Operation shall pay winning progressive Payouts at no less than the amounts listed below:

<u>Hand</u>	<u>Payout</u>
Royal Flush	100.00% (one hundred percent) of progressive Jackpot
Straight Flush	Either 10.00% (ten percent) of the progressive Jackpot or \$5,000, as designated in the Nation Gaming Operation's approved system of internal controls
	\$500.00
Four-of-a-kind	

Full House	\$100.00
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Flush	\$50.00
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- (6) The rate of progression for the progressive meter used for the progressive Payouts in paragraph (j) (5) above shall be no less than 70.00% (seventy percent). The initial (seed) and reset amount shall be established by the Nation Gaming Operation and approved in writing by the SGA.
 - (7) Winning progressive Payout Hands shall be paid in accordance with the amount reflected on the meter when it is the player's turn to be paid; provided, however, that if more than one player at a table has a royal flush progressive Payout Hand, each player shall share equally in the amount reflected on the progressive meter when the first player with a royal flush is to be paid.
- (k) Irregularities
- (1) If a hole card is exposed prior to the Dealer announcing "No more bets," all Hands shall be void.
 - (2) A card that is found face up in the shoe or the deck while the cards are being dealt shall not be used in the game and shall be placed face dovm in the discard rack. If more than one card is found face up in the shoe or the deck during the dealing of the cards, all Hands shall be void and the cards shall be washed and reshuffled.
 - (3) A card drawn in error without its face being exposed

shall be used as though it was the next card from the shoe or the deck.

- (4) If a player is dealt an incorrect number of cards, that player's Hand shall be void. If the Dealer is dealt four cards of the five card Hand, the Dealer shall deal an additional card to complete the Hand. Any other misdeal to the Dealer shall result in all Hands being void and the cards shall be reshuffled.
 - (5) If an automated card shuffling device is being used and the device jams, stops shuffling during a Shuffle, or fails to complete a Shuffle cycle, the cards shall be reshuffled in accordance with procedures approved in writing by the SGA.
 - (6) If an automated dealing shoe is being used and the device jams, stops dealing cards, or fails to deal all cards during a round of play, the round of play shall be void and the cards shall be removed from the device and reshuffled with any cards already dealt, in accordance with procedures approved in writing by the SGA.
 - (7) An automated card shuffling device or automated dealing shoe shall be removed from a gaming table before any other method of shuffling or dealing may be utilized at that table.
- (1) Minimum Wagers and Maximum Wagers.

The Nation Gaming Operation shall determine the minimum and maximum wagers at each table including the value of the gaming

chips used in the Progressive Jackpot. The amounts of the minimum and maximum wagers shall be conspicuously posted on a sign at each table.

7. Chuck-a-luck (Dai Shu)

(a) Equipment

- (1) Table. Chuck-a-luck shall be played at a table having on one side places for the players and on the opposite side a place for the Dealer. Each Chuck-a-luck table shall have a Drop Box and a tip box attached to the Dealer's side of the gaming table, but on opposite sides of the Dealer, as approved in writing by the SGA and the SGO.
- (2) Layout. A Layout for a Chuck-a-luck table shall be approved in writing by the SGA and the SGO and shall contain, at a minimum:
 - a. The name or logo of the Nation Gaming Operation; and
 - b. Spaces bearing the numbers 1, 2, 3, 4, 5, 6, spaces for field bets, over 10 bets, and under 11 bets; and
 - c. The Payout odds.
- (3) Chuck-a-luck shall be played with a container, to be known as a "Chuck-a-luck cage," which shall be used to shake three dice in a manner so as to cause a random intermixing of the dice. The Chuck-a-luck cage shall be designed and constructed to contain any feature the SGA and the SGO may require in writing to maintain the integrity of the game and shall, at a minimum, adhere to the following specifications:

1. The Chuck-a-luck cage shall be capable of securely housing three dice at all times; and
 2. The Chuck-a-luck cage shall have the name or identifying logo of the Nation Gaming Operation imprinted or impressed thereon; and
 3. The Chuck-a-luck cage shall be secured to the Chuck-a-luck table when the table is open for gaming activity.
- (4) Three dice, each of which shall conform to the specifications and requirements of Appendix B, Section 66.
- (b) Permissible wagers. Each player may wager that the three dice, after being tumbled and uncovered by the Dealer in the dice cage will result in particular combinations. The following shall constitute the definitions of permissible combinations upon which a player may wager at the game of Chuck-a-luck:
- (1) Chuck Numbers. Chuck number wager shall mean a wager which shall win if a particular number appears on one or more of the three dice.
 - (2) Field Bets. Field Bet shall mean a wager which shall win if one of the following numbers appears: 5, 6, 7, 8, 13, 14, 15, 16.
 - (3) Over 10. Over 10 shall mean a wager which shall win if the total of the three dice is 11 or more. A player

loses if the three dice total 10 or less or if a three-of-a-kind is rolled.

- (4) Under 11. Under 11 shall mean a wager which shall win if the total of the three dice is 10 or less. A player loses if the three dice total 11 or more or if a three-of-a-kind is rolled.

(c) Play of Chuck-a-luck

- (1) All wagers at Chuck-a-luck shall be made by placing gaming chips and, if applicable, a Match Play Coupon on the appropriate areas of the Chuck-a-luck Layout prior to the Dealer announcing "No more bets" and making a visible hand motion indicating no more bets are to be accepted.
- (2) The Dealer shall either spin or shake the Chuck-a-luck cage so as to cause a random mixture of the dice.
- (3) The Dealer shall then announce the total numeric value of the three dice in the Chuck-a-luck cage. The individual values and total count of the three dice that face upward when the dice come to rest shall be used to determine the outcome.
- (4) All losing wagers shall be immediately collected by the Dealer and placed in the table inventory container.
- (5) The Dealer shall pay all winning wagers consistent with the requirements of subdivision (d) below beginning with the location farthest to the right of the Dealer and continuing counterclockwise around the table.

- (d) Payout odds. The Nation Gaming Operation shall pay off each winning wager at the game of Chuck-a-luck at the odds listed below:

<u>Wager</u>	<u>Payout</u>
Chuck Numbers, one die	1 to 1
Chuck Nwnbers, two dice	2 to 1
Chuck Numbers, all three dice	3 to 1
Field Bets	1 to 1
over 10	1 to 1
Under 11	1 to 1

- (e) Irregularities. If the Dealer uncovers the Under and Over Seven cage and all three dice do not land flat on the bottom of the cage, the Dealer shall call a "No Roll."
- (f) Minimum Wagers and Maximum Wagers.

The Nation Gaming Operation shall determine the minimum and maximum wagers at each table. The amounts of the minimum and maximum wagers shall be conspicuously posted on a sign at each table.

8. Craps

(a) Definitions. The following words and terms, when used in this section, shall have the following meanings unless the context clearly indicates otherwise.

- (1) "Come Out Point" or "Shooter's Point" shall mean a total of 4, 5, 6, 8, 9 or 10 thrown by the Shooter on the come out roll.
- (2) "Come Out Roll" shall mean the first roll of the dice at the opening of the game and the first roll of the dice after a decision with respect to a Pass Bet and Don't Pass Bet has been effected.
- (3) "Come Point" shall mean a total of 4, 5, 6, 8, 9 or 10 thrown by the Shooter on the next roll following placement of a Come Bet or Don't Come Bet.

(b) Equipment

- (1) Table. Craps shall be played at a table consistent with the standards and requirements of Appendix B, Section 75, having on one side places for the players and on the opposite side places for the Dealers and Boxperson. Each Craps table shall have a Drop Box and a tip box attached to the gaming table, in a location approved in writing by the SGA and the SGO.
- (2) Layout. A Layout for a Craps table shall be approved in writing by the SGA and the SGO and shall contain, at a minimum:

- a. The name, trade name or logo of the Nation Gaming Operation;
 - b. Specific areas designated for the placement of wagers; and
 - c. The inscription "No call bets".
- (3) Dice. At least five dice, each of which shall conform to the specifications and requirements of Appendix B, Section 66.
- (c) Permissible wagers
- (1) The following shall constitute the definitions of permissible wagers at the games of craps:
 - a. "Pass Bet" shall mean a wager placed on the Pass Line of the Layout immediately prior to the Come Out Roll. The Pass Bet shall win if, on the Come Out Roll:
 1. A total of 7 or 11 is rolled; or
 2. A total of 4, 5, 6, 8, 9 or 10 is rolled and that total is again rolled before a 7 appears.
 3. The Pass Bet shall lose if, on the Come Out Roll:
 - A. A total of 2, 3, or 12 is rolled; or

- B. A total of 4, 5, 6, 8, 9 or 10 is rolled and a 7 subsequently appears before that total is again rolled.

- b. "Don't Pass Bet" shall mean a wager placed on the Don't Pass Line of the Layout immediately prior to the Come Out Roll. The Don't Pass Bet shall win if, on the Come Out Roll:
 - 1. A total of 2 or 3 is rolled; or
 - 2. A total of 4, 5, 6, 8, 9 or 10 is rolled and a 7 subsequently appears before that total is again rolled.

- c. The Don't Pass Bet shall lose if, on the Come Out Roll:
 - 1. A total of 7 or 11 is rolled; or
 - 2. A total of 4, 5, 6, 8, 9 or 10 is rolled and that total is again rolled before a 7 appears.
 - 3. The Don't Pass Bet shall be considered a "push" or stand off if, on the Come Out Roll, a total of 12 is rolled.

- d. "Come Bet" shall mean a wager placed on the Come Line of the Layout at any time after the Come Out Roll.
 - 1. The Come Bet shall win if, on the roll

immediately following placement of such bet, a total of 7 or 11 is rolled.

2. If a 4, 5, 6, 8, 9 or 10 is rolled, the Dealer shall move the Come Bet into the numbered box corresponding with the number that just rolled. If that number rolls again before a 7 appears, the Come Bet wins.
 3. The Come Bet shall lose if, on the roll immediately following placement of such bet, a total of 2, 3, or 12 is rolled.
 4. If a 4, 5, 6, 8, 9 or 10 is rolled the Dealer shall move the Come Bet into the numbered box corresponding with the number that just rolled. If a 7 appears before that number rolls again, the Come Bet loses.
- e. "Don't Come Bet" shall mean a wager placed on the "Don't Come" area of the Layout at any time after the Come Out Roll.
1. The Don't Come Bet shall win if, on the roll immediately following placement of such bet, a total of 2 or 3 is rolled.
 2. If a 4, 5, 6, 8, 9 or 10 is rolled, the Dealer shall move the Don't Come Bet into a box behind the numbered box corresponding with the number that just rolled. If a 7 appears before

that number rolls again, the Don't Come Bet wins.

3. The Don't Come Bet shall lose if, on the roll immediately following placement of such bet a total of 7 or 11 is rolled.
 4. If a 4, 5, 6, 8, 9 or 10 is rolled, the Dealer shall move the Don't Come Bet into a box behind the numbered box corresponding with the number that just rolled. If that number rolls again before a 7 appears, the Don't Come Bet loses.
 5. The Don't Come Bet shall be considered a "push" or stand off if, on the roll immediately following placement of such bet, a total of 12 is rolled.
- f. "Place Bet" shall mean a wager that may be made at any time on any or all of the specific numbers 4, 5, 6, 8, 9 or 10 which shall win if the specific number on which the wager was placed is rolled before a 7 and which shall lose if a 7 is rolled before such number. All Place Bets shall be inactive on any Come Out Roll unless called "On" by the player and confirmed by the Dealer through placement of an "On" marker button on top of such player's wager.
- g. "Four the Hardway" shall mean a wager, that may be made at any time, which shall win if a total of 4

is rolled the hardway (i.e., with 2 appearing on each die) before 4 is rolled in any other way and before a 7 is rolled.

- h. "Six the Hardway" shall mean a wager, that may be made at any time, which shall win if a total of 6 is rolled the hardway (i.e., with 3 appearing on each die) before 6 is rolled, in any other way and before a 7 is rolled.
- i. "Eight the Hardway" shall mean a wager, that may be made at any time, which shall win if a total of 8 is rolled the hardway (i.e., with 4 appearing on each die) before 8 is rolled in any other way and before 7 is rolled.
- j. "Ten the Hardway" shall mean a wager, that may be made at any time, which shall win if a total of 10 is rolled the hardway (i.e., with 5 appearing on each die) before 10 is rolled in any other way and before a 7 is rolled.
- k. "Field Bet" shall mean a one roll wager that may be made at any time which shall win if any one of the

totals 2, 3, 4, 9, 10, 11 or 12 is rolled on the roll immediately following placement of such bet and shall lose if a total of 5, 6, 7 or 8 is rolled on such roll.

- l. "Any Seven" shall mean a one roll wager that may be made at any time which shall win if a total of 7 is rolled on the roll immediately following placement

of such bet and shall lose if any other total is rolled.

- m. "Any Craps" shall mean a one roll wager that may be made at any time which shall win if a total of 2, 3 or 12 is rolled on the roll immediately following placement of such bet and shall lose if any other total is rolled.
- n. "Craps Two" shall mean a one roll wager that may be made at any time which shall win if a total of 2 is rolled on the roll immediately following placement of such bet and shall lose if any other total is rolled.
- o. "Craps Three" shall mean a one roll wager that may be made at any time which shall win if a total of 3 is rolled on the roll immediately following placement of such bet and shall lose if any other total is rolled.
- p. "Craps Twelve" shall mean a one roll wager that may be made at any time which shall win if a total of 12 is rolled on the roll immediately following placement of such bet and shall lose if any other total is rolled.
- q. "11 in One Roll" shall mean a one roll wager that may be made at any time which shall win if a total of 11 is rolled on the next roll and shall lose if any other total is rolled.

- r. "Craps-Eleven or C and E" shall mean a one roll wager that may be made at any time which shall win if either a craps (2, 3 or 12) or an 11 is rolled immediately following placement of such bet and shall lose if any other total is rolled.
- s. "Horn Bet" shall mean a one roll wager that may be made at any time which shall win if any one of the totals 2, 3, 11 or 12 is rolled on the roll immediately following placement of such bet and shall lose if any other total is rolled.
- t. "Horn High Bet" shall mean a wager that may be made at any time which shall win if any one of the totals 2, 3, 11 or 12 is rolled immediately following placement of such bet and shall lose if any other total is rolled. A Horn High Bee shall be placed in units of five with four units wagered as a Horn Bet and an additional unit wager on one of the totals 2, 3, 11 or 12. If the Nation Gaming Operation does not have a designated area on its Layouts for the acceptance of a Horn High Bet, the Dealer shall break down the wager into two separate wagers on the "Horn" and one of the totals 2, 3, 11 or 12 as selected by the player.

(2) Only the wagers listed in paragraph (c) (l) above or those approved in writing by the SGA shall be permissible at the games of craps.

(d) Making and removal of wagers

- (1) Wagers should be made before the dice are rolled. However, they may be made between the time the dice leave the Shooter's Hand and the time the dice come to rest provided that they are confirmed orally by the Dealer and a Boxperson or above.
- (2) All wagers shall be made by placing gaming chips, and if applicable, Match Play Coupons (only for Pass or Don't Pass wagers) on the appropriate areas of the Layout.
- (3) A wager made on any bet may be removed or reduced at any time prior to a roll that decides the outcome of such wager except that a Pass Bet and a Come Bet shall not be removed or reduced after a Shooter's Point or Come Point is established with respect to such bet(s).
- (4) A Don't Come Bet and a Don't Pass Bet may be removed or reduced at any time but shall not be replaced or increased after such removal or reduction.
- (5) All Place Bets, Come Odds, and Hardways shall be inactive on any Come Out Roll unless called "On" by the player and confirmed by the Dealer through placement of an "On" marker button on the top of that player's wager. All other wagers by that player shall be considered "On."

(e) Payout odds

- (1) All odds, with the exception of those listed in subdivision (f) below, shall be stated on the Layout and in a brochure or other publication distributed by the Nation Gaming Operation. All odds shall be listed as

"to" and no odds shall be stated through use of the word "for."

- (2) Neither the Nation Gaming Operation nor any gaming employee thereof shall pay off winning wagers at the game of Craps at less than the odds listed below. The Nation Gaming Operation may pay off winning wagers at higher odds than those listed below provided that such odds are uniform within the gaming facility and the higher odds have both been approved in writing by the SGA and have been conspicuously posted.

<u>Wager</u>	<u>Payout Odds</u>
Pass Bet	1 to 1
Don't Pass Bet	1 to 1
Come Bet	1 to 1
Don't Come Bet	1 to 1
Place Bet 4 to Win	9 to 5
Place Bet 5 to Win	7 to 5
Place Bet 6 to Win	7 to 6
Place Bet 8 to Win	7 to 6
Place Bet 9 to Win	7 to 5

Place Bet 10 to Win	9 to 5
Four the Hardway	7 to 1
Six the Hardway	9 to 1
Eight the Hardway	9 to 1
Ten the Hardway	7 to 1
Field Bet on 3, 4, 9, 10, or 11	1 to 1
Field Bet on 2	2 to 1
Field Bet on 12	either 2 to or 3 to 1
Any Seven	4 to 1
Any Craps	7 to 1
Craps 2	30 to 1
Craps 3	15 to 1
Craps 12	30 to 1
11 in one roll	15 to 1

- (3) A Horn Bet and Horn High Bet shall be paid as if they were four separate wagers on 2, 3, 11 and 12.

- (4) A Craps-Eleven or C and E bet shall be paid as if one half of the wagered amount had been placed on "Any Craps" and one half on "Eleven," and shall be paid as if two separate wagers were made for the one roll.
 - (5) Neither the Nation Gaming Operation nor any gaming employee shall accept any wager that because of the amount thereof cannot be paid at the odds permitted by paragraphs (c) (2), (c) (3) or (c) (4) above.
- (f) Supplemental wagers made after the Come Out Roll in support of Pass, Don't Pass, Come and Don't Come Bets (taking and laying odds)
- (1) Whenever a player makes a Pass Bet and a total of 4, 5, 6, 8, 9 or 10 is rolled as the Shooter's Point, that player shall have the right to make a supplemental wager in support of the Pass Bet which may be limited by the Nation Gaming Operation to an amount that is equal to the amount of the original Pass Bet. If, in such circumstances, the Pass Bet wins, the original Pass Bet shall be paid at odds of 1 to 1 and the supplemental wager shall be paid at odds of 2 to 1 if the Shooter's Point was 4 or 10, 3 to 2 if the Shooter's Point was 5 or 9, and 6 to 5 if the Shooter's Point was 6 or 8.
 - (2) Whenever a player makes a Don't Pass Bet and a total of 4, 5, 6, 8, 9 or 10 is rolled as the Shooter's Point, the player shall have the right to make a supplemental wager in support of the Don't Pass Bet which may be limited by the Nation Gaming Operation to an amount so calculated as to provide winnings not in excess of the amount

originally wagered on the Don't Pass Bet. If, in such circumstances, the Don't Pass Bet wins, the original Don't Pass Bet shall be paid at odds of 1 to 1 and the supplemental wager shall be paid at odds of 1 to 2 if the Shooter's Point was 4 or 10, 2 to 3 if the Shooter's Point was 5 or 9, and 5 to 6 if the Shooter's Point was 6 or 8.

- (3) Whenever a player makes a Come Bet and a total of 4, 5, 6, 8, 9 or 10 is rolled on the roll immediately following placement of such bet, the player shall have the right to make a supplemental wager in support of the Come Bet which may be limited by the Nation Gaming Operation to an amount that is equal to the amount of the original Come Bet. If, in such circumstances, the Come Bet wins, the original Come Bet shall be paid at odds of 1 to 1 and the supplemental wager shall be paid at odds of 2 to 1 if the come point was 4 or 10, 3 to 2 if the come point was 5 or 9, and 6 to 5 if the come point was 6 or 8.

- (4) Whenever a player makes a Don't Come Bet and a total of 4, 5, 6, 8, 9 or 10 is rolled on the roll immediately following placement of such bet, the player shall have the right to make a supplemental wager in support of the Don't Come Bet which may be limited by the Nation Gaming Operation to an amount so calculated as to provide winnings not in excess of the amount originally wagered on the Don't Come Bet. If, in such circumstances, the Don't Come Bet wins, the original Don't Come Bet shall be paid at odds of 1 to 1 and the supplemental wager shall be paid at odds of 1 to 2 if the come point was a 4 or 10, 2 to 3 if the come point was 5 or 9, and 5 to 6 if

the come point was 6 or 8.

- (5) The Nation Gaming Operation may allow a supplemental wager in support of a Pass or Come Bet in an amount up to five times the amount of the original Pass Bet or Come Bet. The Nation Gaming Operation may allow a supplemental wager in support of a Don't Pass Bet or Don't Come Bet in an amount so calculated as to provide a winning player with winnings not in excess of up to five times the amount originally wagered on the Don't Pass Bet or Don't Come Bet. The original Pass Bet, Don't Pass Bet, Come Bet or Don't Come Bet and any supplemental wager allowed pursuant to this subsection shall be paid at the same odds as the original and supplemental wagers are paid under paragraphs (f) (1) through (f) (4) above.
 - (6) Notwithstanding paragraph (f) (5) above, the Nation Gaming Operation may accept a supplemental wager that exceeds an amount that is otherwise authorized by this section or posted as the maximum wager permitted provided that the excess amount of the supplemental wager is necessary to facilitate the Payouts permitted by this section.
- (g) Dice: retention; selection
- (1) A set of at least five dice conforming to the specifications contained in Appendix B, Section 66 shall be present at the Craps table during gaming. Control of the dice at a Craps table, shall be the responsibility of the Stickperson at the table. The Stickperson shall retain all dice, except those in active play, in a dice cup at the table.

- (2) At the commencement of play the Stickperson shall offer the set of dice to the player immediately to the left of the Boxperson at the table. If such a player rejects the dice, the Stickperson shall offer the dice to each of the other players in turn clockwise around the table until one of the players accepts the dice;
- (3) The first player to accept the dice when offered shall become the "Shooter" who shall select and retain two of the dice offered. The remaining dice of the set shall be returned to the dice cup which shall be placed immediately in front of the Stickperson.

(h) Throw of the dice

Upon selection of the dice, the Shooter shall make a Pass Bet or Don't Pass Bet after which he shall throw the two selected dice so that they leave his or her hand simultaneously and in a manner calculated to cause them to strike the end of the table farthest from the Shooter.

(i) Invalid roll of the dice

- (1) A roll of the dice shall be invalid whenever either or both of the dice go off the table or whenever one die comes to rest on top of the other.
- (2) The persons listed in paragraph (i) (5) below shall have the authority to invalidate a roll of the dice by calling "No Roll" for any of the following reasons:
 - a. The dice do not leave the Shooter's hand

simultaneously;

- b. Either or both of the dice fail to strike the end of the table farthest from the Shooter;
 - c. Either or both of the dice come to rest on the chips constituting the Craps bank located in front of the Boxperson.
 - d. Either or both of the dice come to rest in the dice cup in front of the Stickperson or on one of the rails surrounding the table;
 - e. The use of a cheating, crooked or fixed device or technique in the roll of the dice; and
 - f. For any other reason the craps Boxperson or Stickperson considers the throw to be improper.
- (3) The call of "No Roll" under either subparagraphs (i) (2) (a), (i) (2) (b) or (i) (2) (f) above shall, whenever possible, be made before both dice come to rest.
- (4) A throw of the dice which results in the dice coming into contact with any Match Play Coupons or chips on the table, other than the Craps bank of chips located in front of the Boxperson, shall not be a cause for a call of "No Roll".
- (5) "No Roll" may be called by a Boxperson or Stickperson, as approved in writing by the SGA, with a copy to the SGO.

(j) Point throw; settlement of wagers

(1) When the two dice come to rest from a valid throw, the Stickperson shall at once call out the sum of the numbers reflected on the high or upwards facing sides of the two dice. Only one face on each die shall be considered upward.

a. In the event either or both of the dice do not land flat on the table (for example, one edge of the die is resting cocked on a stack of chips), the side directly opposite the side that is resting on the chips or other object shall be considered upward. If more than one side of a die is resting on a stack of chips or other object, the rull shall be void and the dice shall be re-rolled.

b. In the event of a dispute as to which face is the uppermost the Boxpersion shall have discretion to determine which face is upward or to order that the throw be void and the dice be re-rolled.

(2) After calling the throw, the Stickperson shall collect the dice and bring them to the center of the table between himself and the Boxpersion. All wagers decided by that throw shall then be settled, following which the Stickperson shall pass the dice to the Shooter for the next throw. When collecting the dice and passing them to the Shooter, the Stickperson shall use a stick designed for that purpose.

(k) Continuation of shooter as such; selection of new shooter

- (1) It shall be the option of the Shooter, after any roll, either to pass the dice or remain the Shooter except that:
 - a. The Shooter shall pass the dice upon rolling a loser 7; and
 - b. The Boxperson may order the Shooter to pass the dice if the Shooter unreasonably delays the game, repeatedly makes invalid rolls or violates either the Compact or its Appendices.

- (2) If a Shooter, after making the Come Out Point, elects not to place a Pass Bet or Don't Pass Bet, and other wagers remain on the table with respect to Come and/or Don't Come numbers, the Stickperson shall offer the dice to the player immediately to the left of the previous Shooter, as provided for in paragraph (k) (3) below. If there are no other players at the table, or if no other players at the table elect to make a Pass Bet or Don't Pass Bet in order to shoot the dice and continue the game, the previous Shooter shall be allowed to shoot the dice without a Pass Bet or Don't Pass Bet only for the purpose of effecting a decision on the remaining Come Bet and/or Don't Come Bet wagers. The On/Off marker shall be placed on the Don't Pass Line in the Off position in front of the Shooter in order to indicate that the Shooter is rolling the dice only to effectuate a decision for those wagers remaining on the Layout. Once the remaining Come Bet and/or Don't Come Bet wagers have been decided or a player wishes to place a Pass Bet or Don't Pass Bet the game shall proceed.

- (3) Whenever a voluntary or compulsory relinquishment of the dice occurs by the Shooter, the Stickperson shall offer the complete set of five or more dice to the player immediately to the left of the previous Shooter and, if he or she does not accept, to each of the other players in turn clockwise around the table.
- (4) The first player to accept the dice when offered shall become the new Shooter who shall select and retain two of the dice offered. The remaining dice of the set shall be returned to the dice cup which shall be placed immediately in front of the Stickperson.

(1) Minimum wagers and maximum wagers

The Nation Gaming Operation shall determine the minimum and maximum wagers at each table. The amounts of the minimum and maximum wagers shall be conspicuously posted on a sign at each table.

9. Gaming Devices

(a) Definitions. For the purposes of this Section, the following definitions shall apply:

- (1) Slot Machine shall be defined as a video facsimile or slot machine which means any mechanical, electrical or other device, contrivance or machine, which upon insertion of a coin, currency, token or similar object therein, or upon payment of any consideration whatsoever, is available to play or operate, the play or operation of which, whether by reason of the skill of the operator or application of the element of chance or both, may deliver or entitle the person playing or operating the machine to receive cash or tokens to be exchanged for cash or to receive any merchandise or thing of value, whether the payoff is made automatically from the machine or in any other manner whatsoever.
- (2) Video Lottery Gaming Devices shall be defined as a network of five or more player terminals, connected to the On-Line System, with touch-screen, button-controlled video screen or other electronic display devices, including but not limited to single or multi-stage displays, secondary electronically-controlled displays such as wheels, dice, or other displays. The video lottery gaming devices shall not eject nor otherwise dispense coins or currency and shall perform the following functions related to the game:
 - a. Accepts currency, other representative of value or a cashless activation card qualifying the player to

participate in one or more games.

- b. Provides players with the ability to choose, or have the video lottery gaming devices automatically choose for them, combinations of numbers, colors and/or symbols.
 - c. Electronically displays, if applicable, the game identifier and the player choices.
 - d. Prints and dispenses a redemption ticket, or otherwise provides a representation of the value of player winnings in a manner consistent with the technical standards of this Compact, when the player activates the cash-out function.
 - e. Displays game information such as credit balance and other information as required or permitted in the technical standards of this Compact.
 - f. Displays, for verification purposes, the game results.
 - g. Performs security functions necessary to maintain the integrity of the operation of the gaming device, as provided in the technical standards of this Compact.
- (b) Gaming Devices shall be operated in accordance with the specifications set forth in Section 76 of Appendix B.

(c) Exclusivity.

- (1) Subject to subparagraphs 12(a) (2) and 12(a) (3) of the Compact, the Nation has total exclusivity with respect to the installation and operation of, and no person or entity other than the Nation is permitted to install or operate, Gaming Devices, including slot machines, within the geographic area defined by: (i) to the east, State Route 14 from Sodus Point to the Pennsylvania border with New York; (ii) to the north, the border between New York and Canada; (iii) to the south, the Pennsylvania border with New York; and (iv) to the west, the border between New York and Canada and the border between Pennsylvania and New York.
- (2) In the event the Tuscarora Indian Nation or the Tonawanda Band of Seneca Indians initiate negotiations with the State to establish a Class III Gaming compact, the State may agree to include Gaming Devices in any such compact that permits gaming facilities within the geographical area of exclusivity set forth in Paragraph 12(a) (1) of the Compact without causing a breach of Paragraph 12 of the Compact; (i) provided, however, that the State cannot permit another Indian nation to establish a Class III Gaming facility within a twenty five (25) mile radius of any Gaming Facility site authorized under the Compact unless such facility is to be established on federally recognized Indian lands existing as of the Effective Date of the Compact.
- (3) The exclusivity granted under Paragraph 12(a) (1) of the Compact shall cease to apply with respect to any one of

the sites authorized under the Compact: (i) if the Nation fails to commence construction on such site with thirty six (36) months of the Effective Date; or (ii) if the Nation fails to commence Class III Gaming operations on such site within sixty (60) months of the Effective Date of the Compact.

- (4) With the exception of a violation of the proviso set forth in Paragraph 12(a)(2)(i) of the Compact, the Nation's obligation to pay and the State's right to receive the State Contribution from the operation and conduct of a particular category of Gaming Device as defined in Paragraph 1(m) of the Compact shall cease immediately in the event of a breach by the State of the exclusivity provisions set forth in Paragraph 12(a) of the Compact only as to that particular category of Gaming Device for which exclusivity no longer exists.
- (5) With respect to a violation of the proviso set forth in Paragraph 12(a)(2)(i) of the Compact, the Nation's obligation to pay and the State's right to receive the State Contribution shall cease immediately as to all categories of Gaming Devices.

(d) State Contribution.

- (1) In consideration of the exclusivity granted by the State pursuant to Paragraph 12(a) of the Compact, the Nation will contribute to the State a portion of the proceeds from the operation and conduct of each category of Gaming Device for which exclusivity exists, based on the net drop of such machines (money dropped into machines, after

Payout but before expense) and totaled on a cumulative quarterly basis to be adjusted annually at the end of the relevant fiscal year, in accordance with the sliding scale set forth below ("State Contribution"):

Years 1-4

18%, with "Year 1" commencing on the date on which the first Gaming Facility established pursuant to the Compact begins operation, and with Payments during this initial period are to be made on an annual basis.

Years 5-7

22%, with payments during this period to be made on a semi-annual basis.

Years 8-14

25%, with payments during this period to be made on a quarterly basis.

- (2) In the event the States reaches a compact with another Indian tribe regarding Gaming Devices of a like kind that has State contribution provisions that are more favorable to the Indian tribe than those set forth herein, the terms of such other compact are automatically applicable to the Compact at the Nation's option.
- (3) Any dispute regarding a payment by the Nation of the State Contribution must be raised within one (1) year of

the receipt by the State of the audited financial statements required pursuant to Paragraph 8(c) (2) of the Compact.

10. Hazard

(a) Equipment.

- (1) Table. Hazard shall be played at a table which shall have a Drop Box and a tip box attached to the Dealer's side of the gaming table in a location and manner approved in writing by the SGA and the SGO.
- (2) A sealed container, to be known as a "Hazard shaker," which shall be used to shake the dice in order to arrive at the winning combinations. The Hazard shaker shall be designed and constructed to contain, at a minimum, the following specifications:
 - a. The Hazard shaker shall have a compartment to secure the three dice and a separate cover which conceals the dice while the Dealer is shaking it. The compartment to secure the three dice shall be transparent and the cover which conceals the dice shall be opaque;
 - b. The Hazard shaker shall have the capability of being sealed or locked in order to ensure the integrity of the dice contained therein;
 - c. The Hazard shaker shall be secured to the Hazard table when the table is open for gaming activity.
- (3) Three dice, each of which shall conform to the specifications and requirements of Appendix B, Section 66;

(4) Layout. The Layout for Hazard table shall be approved in writing by the SGA and the SGO and shall contain, at a minimum:

- a. The name or logo of the Nation Gaming Operation;
- b. Specific areas designated for the placement of the wagers; and
- c. The Payout odds.

(b) Wagers

- (1) All wagers at Hazard shall be made by placing gaming chips and, if applicable, a Match Play Coupon on the appropriate areas of the Hazard Layout.
- (2) Each player shall be responsible for the correct positioning of his or her wagers on the Hazard Layout regardless of whether the player is assisted by the Dealer. Each player must ensure that any instructions given to the Dealer regarding the placement of wagers are correctly carried out.
- (3) Each wager shall be settled strictly in accordance with its position on the Layout when the dice come to rest.

(c) The play of Hazard

- (1) Prior to shaking the Hazard shaker, the Dealer shall orally announce "no more bets" and make a visible hand motion indicating no more bets are to be accepted.

- (2) Once "No more bets" has been announced and signaled, the Dealer shall place the cover on the Hazard shaker and shake the Hazard shaker at least three times so as to cause a random mixture of the dice.
- (3) The Dealer shall then remove the cover from the Hazard shaker and announce the numeric value of each die.
- (4) After the winning combinations have been illuminated, the Dealer shall first collect all losing wagers and then pay off all winning wagers at the odds currently being offered in accordance with subdivision (e) below. The Hazard shaker shall remain uncovered until all winning wagers have been paid.

(d) Permissible wagers. Each player may wager that the three dice, after being shaken and uncovered by the Dealer, will result in particular combinations. The following shall constitute the definitions of permissible combinations upon which a player may wager at the game of Hazard:

- (1) Raffles. The player wagers that any specific three-of-a-kind (three aces, three deuces, etc.) will appear on the dice.
- (2) Any raffle. The player wagers that any three-of-a-kind will appear.
- (3) Low bet. The player wagers that the total count on the dice will be 10 or below. The wager loses if three-of-a-kind appear.

- (4) High bet. The player wagers that the total count on the dice will be 11 or more. The wager loses if three-of-a-kind appear.
- (5) Odd and Even bet. A wager that the total count on the dice will be an odd or even number. The wager loses if three-of-a-kind appear.
- (6) Numbers bet. The player wagers on a specific total shall win if the numeric total of all three dice equals that specific total.
- (7) Chuck numbers. The player wagers on whether a particular number will appear on one, two or all three of the dice.

(e) Odds. The Nation Gaming Operation shall pay off winning wagers at the game of Hazard at no less than the odds listed below:

<u>Wager</u>	<u>Payout Odds</u>
Raffles	180 to 1
Any raffle	30 to 1
Low bet	1 to 1
High bet	1 to 1
Odd and Even bet	1 to 1

(The wager loses if three-of-a-kind appear)

Numbers bet, value total equals:

4	60 to 1
5	30 to 1
6	18 to 1
7	12 to 1
8	8 to 1
9	6 to 1
10	6 to 1
11	6 to 1
12	6 to 1
13	8 to 1
14	12 to 1
15	18 to 1
16	30 to 1
17	60 to 1

Chuck numbers

One die	1 to 1
Two dice	2 to 1
Three dice	3 to 1

(f) Irregularities

If the Dealer uncovers the Hazard shaker and all three dice do not land flat on the bottom of the shaker, the Dealer shall call a "No Roll."

(g) Minimum Wagers and Maximum Wagers.

The Nation Gaming Operation shall determine the minimum and maximum wagers at each table. The amounts of the minimum and maximum wagers shall be conspicuously posted on a sign at each table.

11. Joker Seven

(a) Equipment.

- (1) Table. Joker Seven shall be played at a table having on one side places for the players and on the opposite side a place for the Dealer. Each Joker Seven table shall have a Drop Box and a tip box attached to the Dealer's side of the gaming table, but on opposite sides of the Dealer, as approved in writing by the SGA and the SGO.
- (2) Layout. The Layout for a Joker Seven table shall be approved in writing by the SGA and the SGO and shall contain, at a minimum:
 - a. The name or logo of the Nation Gaming Operation; and
 - b. Specific areas designated for the placement of wagers.
- (3) Discard rack. In order to collect the cards at the conclusion of a round of play and at such other times as provided in the Compact or its Appendices, each Joker Seven table shall have a discard rack securely attached to the top of the Dealer's side of the table. The height of each discard rack shall equal the height of the cards, stacked one on top of the other, contained in one deck; provided, however, that a taller discard rack may be used if such rack has a distinct and clearly visible mark on its side to show the exact height for one deck.

- (4) Automated card shuffling device (Optional) . An automated card shuffling device is a device which can automatically perform a Shuffle. Such a device shall meet the requirements of Appendix B, Section 71.
- (5) A dealing shoe, which shall meet the requirements of Appendix B, Section 71.
- (6) Cards; number of decks
 - a. Except as provided in subparagraph (a) (4) (b) below, Joker Seven shall be played with one standard deck of cards with backs of the same color and design, one additional cutting card and one additional cover card. The cutting card and cover card shall be opaque and in a solid color readily distinguishable from the color of the backs and edges of the playing cards, as approved in writing by the SGA and the SGO. The deck of cards used to play Joker Seven shall meet the requirements of Appendix B, Section 69 and shall include two Jokers.
 - b. If an automated card shuffling device is used for Joker Seven, the Nation Gaming Operation shall be permitted to use a second deck of cards to play the game, provided that:
 - 1. Each deck of cards complies with the requirements of subparagraph (a) (4) (a) above;
 - 2. The backs of the cards in the two decks are of

a different color;

3. One deck is being Shuffled by the automated card shuffling device while the other deck is being dealt or used to play the game;
 4. Both decks are continuously alternated in and out of play, with each deck being used for every other round of play; and
 5. The cards from one deck only shall be placed in the discard rack at any given time.
- c. All cards opened for use on a table and dealt from a manual or automated dealing shoe shall be changed at least once every eight hours. All cards opened for use on a table and dealt from the Hand shall be changed at least every four hours.

(b) Opening of table for gaming

- (1) After receiving the one or two decks of cards at the table, the Dealer shall sort and inspect each face-down decks of cards and the floorperson assigned to the table shall visually verify the inspection.
- (2) After the cards are inspected, the cards shall be spread out face upwards on the table for visual inspection by the first player or players to arrive at the table. The cards shall be spread out in horizontal fan shaped columns by deck according to suit. The cards in each suit shall be laid out in sequence within the suit.

- (3) After the first player or players is afforded an opportunity to visually inspect the cards, one deck of cards shall be inserted into the automated card shuffling device and Shuffled, if applicable, or shall be turned face downward on the table, mixed thoroughly by a "Washing" of the cards and stacked. If a second deck of cards is utilized, it shall be inserted into the automated card shuffling device and Shuffled.

(c) Shuffle and cut of the cards

- (1) Immediately prior to commencement of play, and after any each round of play, the Dealer shall wash and "Chemmy Shuffle" the cards so that they are randomly intermixed.
- (2) After the cards have been Shuffled by the Dealer or the automated card shuffling device, the Dealer shall offer the stack of cards, with backs facing away from him or her, to the players to be cut.
- (3) The player designated by paragraph (c) (5) below shall cut the cards by placing the cutting card in the stack at least 10 cards in from either end.
- (4) Once the cutting card has been inserted by the player, the Dealer shall take all cards in front of the cutting card and place them to the back of the stack. The Dealer shall then take the entire stack of cards that was just Shuffled and align them along the side of the dealing shoe, if the Nation Gaming Operation elects to deal from a shoe. Thereafter, the Dealer shall insert the cutting card in the stack at a position approximately one-quarter

of the way in from the back of the stack. The stack of cards shall then be inserted into the dealing shoe for commencement of play. The Nation Gaming Operation may, at its discretion, elect to have the game of Joker Seven dealt by Hand.

- (5) The player to cut the cards shall be:
 - a. The first player to the table if the game is just beginning;
 - b. The player at the farthest point to the right of the Dealer.
- (6) If the player designated in paragraph (c) (5) above of this subdivision refuses the cut, the cards shall be offered to each other player moving clockwise around the table until a player accepts the cut. If no player accepts the cut, the Dealer shall cut the cards.
- (7) After the cards have been cut but before any cards have been dealt, a Gaming Facility Supervisor may require the cards to be recut if he or she determines that the cut was performed improperly or in any way that might affect the integrity or fairness of the game. If a recut is required, the cards shall be recut, at the Nation Gaming Operation's option, by the player who last cut the cards, or by the next person entitled to cut the cards, as determined by paragraph (c) (6) above.
- (8) If there is no gaming activity at a Joker Seven table which is open for gaming, the cards shall be removed from

the dealing shoe and the discard rack, and spread out on the table for inspection, either face up or face down. If the cards are spread face down, they shall be turned face up once a player arrives at the table. After the first player is afforded an opportunity to visually inspect the cards, the cards shall be turned face downward on the table. The cards shall be mixed thoroughly by a Washing of the cards, stacked, then Shuffled and cut in accordance with this section.

(d) Wagers

- (1) All wagers at Joker Seven shall be made by placing gaming chips and, if applicable, a Match Play Coupon on the appropriate betting area of the Joker Seven Layout.
- (2) All wagers at Joker Seven shall be placed prior to the Dealer announcing "No more bets" and making a visible hand motion indicating no more bets are to be accepted. Each player at the game of Joker Seven shall make a wager against the Dealer which shall win if:
 - a. The patron has wagered that a specific number of the seven cards dealt by the Dealer are of a particular color as reflected in paragraph (f) (1) below; or
 - b. The patron has wagered that a specific combination of cards matches the seven cards dealt by the Dealer in accordance with paragraph (f) (2) below.
- (3) No wager shall be made, increased or withdrawn after the

Dealer has announced and signaled "No more bets."

(e) Procedure for dealing Joker Seven

- (1) After the cards have been thoroughly Shuffled and cut in accordance with the procedures contained in subdivision (c) and all wagers have been made by players, seven cards are dealt by the Dealer face up from the top of the deck. The seven cards shall be placed in the Layout marking for the deal and shall remain face up on the Layout until all losing wagers are collected and winning wagers paid.
- (2) The Dealer shall audibly state the winning combinations resulting from the seven cards dealt.
- (3) All losing wagers shall be immediately collected by the Dealer and placed in the table inventory container.
- (4) Winning wagers shall then be paid in accordance with the Payout odds contained in subdivision (f).
- (5) After paying all winning wagers, the Dealer shall immediately collect the cards dealt and place them together with the remaining cards in the deck used for that round of play and reshuffle and cut the cards consistent with the procedures in this subdivision.

(f) Payout odds. The Nation Gaming Operation shall pay off each winning wager at the game of Joker Seven at no less than the odds listed below:

- | | |
|----------------|-------------|
| (1) Color bets | <u>Odds</u> |
|----------------|-------------|

4 or more red	Even money
4 or more black cards	Even money
4 red cards (exactly)	2 to 1
4 black cards (exactly)	2 to 1
5 red cards (exactly)	5 to 1
5 black cards (exactly)	5 to 1
6 red cards (exactly)	15 to 1
6 black cards (exactly)	15 to 1
7 red cards (exactly)	25 to 1
7 black cards (exactly)	25 to 1
(2) Other Bets	<u>Odds</u>
No pair	3 to 1
Two pairs	3 to 1
1 Joker	3 to 1
2 Jokers	20 to 1
Any specific pair-aces to kings	9 to 1

Prial (three-of-a-kind)

12 to 1

a. When a prial is dealt:

1. The pair within the prial is paid at 9 to 1. Two Jokers are considered one pair.
2. Two Jokers and another pair are considered two pairs.
3. The Joker has no color value; and
4. A Joker bet loses if two Jokers are dealt.

b. When four-of-a-kind is dealt:

1. A bet on one pair is paid at 9 to 1 once;
2. A bet on two pairs is paid at 3 to 1 once; and
3. A bet on a prial is paid at 12 to 1.

(g) Irregularities

A card found turned face upwards in the deck shall not be used in the game and shall be burned.

(h) Minimum wagers and maximum wagers

The Nation Gaming Operation shall determine the minimum and maximum wagers at each table. The amounts of the minimum and

maximum wagers shall be conspicuously posted on a sign at each table.

12. Keno

- (a) Definitions. The following words and terms, when used in this section, shall have the following meanings unless the context clearly indicates otherwise:
- (1) "Conditioning" means the coding which the player and computer mark on the keno request and keno ticket, respectively, to indicate the type of keno ticket being wagered and the rate at which the keno ticket is to be played.
 - (2) "House advantage" means the difference between true odds (the statistical probability of a selected event occurring) and the established payoff odds (the payoff rate at which a winner will be paid if the selected event occurs).
 - (3) "Keno request" means a keno writer request or a keno runner request.
 - (4) "Keno runner request" means a two-part form or a one-part form with a detachable portion which serves as a receipt used by a patron to select the desired number or numbers (spots) for one or more keno games by giving the form to a keno runner.
 - (5) "Keno ticket" means a one-part computer generated form which is issued by a keno writer or keno runner based on the information recorded on a keno request or, in the case of keno writer, verbalized by a patron.

- (6) "Keno ticket receipt" means a one-part form given to a patron by a keno runner as a receipt for a winning keno ticket that the patron has given to the keno runner to redeem, which contains, at a minimum, the serial number of the keno ticket.
 - (7) "Keno writer request" means a one-part form used by a patron to select the desired number or numbers (spots) for one or more keno games by giving the form directly to a keno writer.
 - (8) "Quick-pick" means a straight or basic keno ticket in which the computer system randomly selects the marked number or numbers (spots) for the patron.
 - (9) "Rate card" means the document issued by the Nation Gaming Operation, as approved in writing by the SGA, listing the available types of wagers, payoff rates, wagering format and such other information as required by this section.
 - (10) "Spots" means the number or numbers selected by a player for a keno game. For example, a keno ticket based on a keno request on which a player selected three numbers is referred to as a "three-spot" keno ticket.
- (b) Permissible wagers
- (1) Keno shall be played with 80 consecutive numbers starting with the number one.
 - (2) The maximum number of spots that may be selected by a

player for any keno game shall be determined by the Nation Gaming Operation and set forth in its SGA approved Rate card.

- (3) The following shall constitute the permissible wagers at the game of keno:
- a. "Straight or basic ticket" is a keno ticket on which a player selects from one spot to the maximum number of spots that may be selected as permitted by the Nation Gaming Operation without any type of groupings. The type of straight or basic ticket shall be determined by the number of spots the player selects.
 - b. "Split ticket" is a keno ticket on which the equivalent of two or more straight or basic tickets are written. Each group of spots shall be separated from each other by either circling each group or by drawing a line between them. The wager shall be limited in that the numbers in one group of spots shall not be duplicated in any other group of spots. For purposes of determining a winning keno ticket, each group of spots on a split ticket shall be evaluated separately.
 1. When all of the groups on a split ticket contain an equal number of spots, the split ticket must be wagered at the same rate for each group.
 2. When at least two groups on a split ticket

contain an unequal number of spots, the split ticket may be wagered at the same or a different rate for each group, notwithstanding clause (b) (3) (b) (1) above.

- c. "Way ticket" is a keno ticket on which a player selects at least two groups containing an equal number of spots which are then combined to form several straight or basic ticket combinations within one ticket. Each group played must be wagered at the same rate.
- d. "Combination ticket" is a keno ticket on which a player selects at least two groups containing any number of spots and also selects how the groups shall be combined to form multiple tickets within one ticket.
- e. "King ticket" is a keno ticket on which a player selects a single spot which is referred to as the "king" and then combines the king with other groups of spots to form multiple tickets within one ticket. A king ticket may contain more than one king.
- f. "Multi-race ticket" is a keno ticket which is wagered for more than one game. All of the games covered by the ticket must be consecutive and must be wagered at the same rate.

(c) Placement of wagers; Payout requirements

- (1) All wagering at the game of keno shall be conducted at a keno work station.
- (2) All wagers at keno shall be made with currency, coin, gaming chips, or coupons. Except for a quick-pick or an oral wager, each player shall be required to use a keno request in order to place a wager. Oral wagers shall only be made directly with a keno writer and shall not be made through or with a keno runner. Nothing herein shall preclude the acceptance of a losing or winning keno ticket as the patron's keno writer request for the next game.
- (3) Each player shall be responsible for ensuring that the spots recorded on the keno ticket agree with the spots marked on the player's keno request or the wagers orally requested by the player. The Nation Gaming Operation shall not be responsible for any error by a keno writer on a ticket purchased directly from the keno writer which the player does not detect prior to the start of the first game for which the ticket has been generated. The Nation Gaming Operation shall also not be responsible for any error on a ticket purchased through a keno runner if the error is not detected or cannot be corrected prior to the start of the first game for which the ticket has been generated. Keno runner request forms shall bear notice of this limitation. All winnings shall be paid in accordance with the computer-generated keno ticket and not the keno request or the player's oral wager. A keno ticket may not be voided or changed once the keno computer system has been locked out for the start of the game.

- (4) The Nation Gaming Operation shall provide notice of the minimum wagering requirements and the maximum wagers in effect at the game of keno in its approved rate card.
 - (5) The Nation Gaming Operation shall set payoff amounts which shall increase arithmetically in proportion to the amount of the wager until any maximum payoff is reached. The Nation Gaming Operation may establish a maximum aggregate payoff of not less than \$100,000.00 per game, which amount shall be equal to any maximum payoff amount which may be established for an individual wager. Notwithstanding any maximum payoff amount, the house advantage shall not exceed thirty (30) percent for the minimum wager which is offered.
- (d) Issuance of keno tickets
- (1) Unless a player uses a previously generated keno ticket as a keno writer request, requests a quick-pick or makes an oral wager, a player shall request the issuance of a keno ticket by completing a keno request and submitting the request to a keno writer or a keno runner, as applicable. The player shall complete a keno request by placing some type of distinguishing mark over the number or numbers he or she wishes to play. Prior to submitting the keno request to a keno writer or keno runner, the player shall properly condition and price the keno request in accordance with the information set forth in the rate card of the Nation Gaming Operation.
 - (2) Keno requests shall contain, at a minimum, the following:

- a. A grid listing the numbers 1 through 80;
 - b. An area to record the number of games to be played;
 - c. An area to record the dollar value of each wager;
 - d. An area to record the conditioning;
 - e. An area for the total price of the ticket; and
 - f. In the case of a keno runner request, an area to identify the particular game or games to be played.
- (3) The keno writer shall input the information on the player's keno request, previously issued keno ticket or oral keno wager into the keno computer system, in a manner approved in writing by the SGA and the SGO. This action shall cause a one-part sequentially numbered keno ticket to be printed. Upon receipt of currency, coin, gaming chips, or coupons in an amount equal to or greater than the total price of the keno ticket from the player or keno runner, the keno writer shall issue the keno ticket and, if due, any change to the player or keno runner. The keno ticket shall contain, at a minimum, the following:
- a. The date and time of issuance;
 - b. The keno work station number where the ticket was issued;

- c. The numbers selected by the patron listed in a clearly identifiable manner;
- d. The number of games to be played;
- e. The first and last game number;
- f. The conditioning;
- g. The rate of each wager;
- h. The number of ways played;
- i. The total price of the keno ticket;
- j. The identification code of the keno writer;
- k. A representation as to the maximum keno limit for each game and an indication as to how that limit will be distributed to winners;
- l. A statement that winning patrons must present a computer generated keno ticket in order to collect winnings;
and
- m. A statement as to the amount of time available to present a claim for the collection of keno winnings.

(4) If the Nation Gaming Operation permits multi-race keno tickets, one keno request shall be used for all of the games to be wagered by the player. The player shall be

required to pay for the wager prior to the start of the first game and shall not be paid for any winning games until the completion of the last game for which the multi-race keno ticket was issued unless the remaining races on the multi-race keno ticket are canceled. The Nation Gaming Operation may permit a player to receive a refund on a multi-race keno ticket for those games not drawn; provided, however, that the keno computer system is capable of generating adequate documentation for the refund and the internal control procedures governing the refund transaction are approved in writing by the SGA.

- (5) A keno writer may void a keno ticket prior to the start of the game for which the keno ticket was issued. A multi-race keno ticket may only be voided, in its entirety, prior to the start of the first game for which the keno ticket was generated. The method for voiding keno tickets shall be approved in writing by the SGA. Each keno computer system shall be capable of maintaining, on a daily basis, a listing of voided keno tickets for each keno work station.

(e) Keno games; selection of numbers

- (1) The Nation Gaming Operation which elects to offer the game of keno shall conduct the game with an independent computer system which selects the winning numbers for the game in a random fashion. The program used to operate the random number generator shall be unique to the Tribe and may not be used by any other jurisdiction with gaming. All keno computer systems shall be approved in writing by the SGA and the SGO. The random number

generator for the keno system shall have a printer or other independent method which records the game numbers and selected winning numbers. The random number generator shall be maintained under dual key control with the SGA Inspector maintaining and controlling one key and the keno Supervisor or Supervisor thereof or another department member as approved in writing by the SGA maintaining and controlling the second key.

- (2) The Nation Gaming Operation, at its discretion, shall determine the number of keno games to be conducted during the gaming day. Nothing in this section shall preclude the Nation Gaming Operation from conducting keno games at different intervals at separate locations. Each keno game conducted during the gaming day shall be assigned a unique sequential game number by the keno computer system.
- (3) A keno Supervisor or a keno writer shall provide oral notice that the current keno game will be closing at least one minute prior to closing that game or the Nation Gaming Operation shall display the minimum remaining time between keno games at each keno booth or satellite keno booth. If keno runners are authorized to accept wagers on a keno game, the game shall not be closed until all such runners have "signed in."
- (4) If the keno computer system does not have an automatic lock-out feature, a keno Supervisor or a keno writer with oral approval from a keno Supervisor shall cause the keno computer system to start a keno game by:

- a. Locking out all keno work station terminals so that no additional keno tickets may be voided or issued for the game being conducted; and
 - b. Randomly selecting 20 of the 80 available numbers.
- (5) If the keno computer system does have an automatic lock-out feature, the Nation Gaming Operation shall be required to submit override procedures which document who performed the override of the lock-out system and the reason for the override. Such procedures shall be approved in writing by the SGA. The ability to override the lock-out feature shall be available only to a keno Supervisor or Supervisor thereof.
- (6) As the 20 numbers are selected by the computer, the keno Supervisor or a keno writer may announce the winning numbers for the patrons in the area of the keno booth or satellite keno booth.
- (7) The 20 numbers which are randomly selected by the keno computer system and the game number shall be displayed or illuminated on a keno board or video monitor visible to patrons in the area of the keno booth and in such other areas of the gaming facility as the Nation Gaming Operation deems appropriate.
- (8) The Nation Gaming Operation shall be required to maintain a record of the winning numbers for each keno game for a period of at least one year.
- (f) Payment of winning wagers

- (1) Except as otherwise provided for Payouts which exceed \$500.00, after the 20 numbers have been selected by the keno computer, a player may take a winning keno ticket to a keno work station for redemption or give the winning ticket to a keno runner who shall redeem the ticket on behalf of the patron. All winning wagers shall be paid in accordance with the information recorded on the computer-generated keno ticket. The method used by the Nation Gaming Operation to evaluate the keno ticket for correct payment and cancellation shall be approved in writing by the SGA. If redeemed by a keno writer, the keno writer shall pay the player directly, or indirectly through a keno runner, from the cash or, upon request of the player, gaming chips in the keno drawer or issue the player a gaming facility check and shall retain the keno ticket in the keno drawer until the end of the keno writer's Shift. If redeemed by a keno runner at a keno booth, satellite keno booth or keno locker, the keno runner shall pay the player with cash from the keno drawer and shall retain the keno ticket in the keno drawer until the end of the keno runner's Shift.
- (2) Winning Payouts of \$1,500.00 or more shall be authorized by a keno Supervisor or a Supervisor thereof. The keno Supervisor or Supervisor thereof shall sign the back of the winning keno ticket as evidence of such authorization.
- (3) All winning keno tickets shall be valid for one year.
- (4) On a yearly basis, the dollar amount of all expired and unclaimed winning keno tickets shall be added to existing

keno jackpot or jackpots by the Nation Gaming Operation as approved in writing by the SGA.

(g) Irregularities

- (1) A keno request which is marked in such a way that it is not clear which number or type of wager is to be played shall be returned to the player for preparation of another keno request.
- (2) A winning keno ticket which is not accepted or read by the keno computer system shall be manually input by the keno writer in a manner approved in writing by the SGA.
- (3) If the keno computer system is not operational, in accordance with the approved system of internal control procedures, a winning keno ticket:
 - a. For \$10.00 or less may be manually paid by a keno writer;
 - b. For more than \$10.00 but less than or equal to \$1,000.00 may be manually paid by the keno writer with authorization from the keno Supervisor or a Supervisor thereof; and
 - c. For over \$1,000.00 may not be paid until the keno ticket can be verified by the keno computer system.

(h) Minimum Wagers and Maximum Wagers.

The Nation Gaming Operation shall determine the minimum and

maximum wagers for keno. The amounts of the minimum and maximum wagers shall be conspicuously posted on a sign at each keno station.

13. Let It Ride Poker

{a} Definitions. The following words and terms, when used in this section, shall have the following meanings unless the context clearly indicates otherwise:

{1} "Community card" means any card which is initially dealt face down to a designated area in front of the table inventory container and which is used by all players to form a five card poker Hand.

(2) "Hand" means the five card poker Hand formed for each player by combining the three cards dealt to the player and the two community cards.

(3) "Let it ride" means that a player chooses not to take back a wager that may be withdrawn.

(4) "Round of play" means one complete cycle of play during which all wagers have been placed, all cards have been dealt and all remaining wagers have been paid off or collected in accordance with the rules of this section.

(5) "Stub" means the remaining portion of the deck after all cards in the round of play have been dealt or delivered.

(6) "Suit" means one of the four categories of cards: club, diamond, heart or spade.

(b) Equipment .

(1) Table. Let It Ride Poker shall be played at a table

having on one side places for the players and on the opposite side a place for the Dealer. Each Let It Ride Poker table shall have a Drop Box and a tip box attached to it on the Dealer's side of the gaming table, in a location approved in writing by the SGA and the SGO.

- (2) Layout. The Layout for a Let It Ride Poker table shall be approved in writing by the SGA and the SGO and shall contain, at a minimum:
 - a. The name or logo of the Nation Gaming Operation; and
 - b. Specific areas designated for the placement of wagers, which betting areas shall not exceed seven in number.
- (3) Discard rack. In order to collect the cards at the conclusion of a round of play and at such other times as provided in the Compact and its Appendices, each Let It Ride Poker table shall have a discard rack securely attached to the top of the Dealer's side of the table. The height of each discard rack shall equal the height of the cards, stacked one on top of the other, contained in one decks; provided, however, that a taller discard rack may be used if such rack has a distinct and clearly visible mark on its side to show the exact height for a stack of cards equal to the total number of cards contained in one deck.
- (4) Automated card shuffling device (Optional) . An automated card shuffling device is a device which can automatically

perform a Shuffle. Such a device shall meet the requirements of Appendix B, Section 71.

- (5) Display boards reflecting the amount of the Progressive Jackpot.
- (6) Meters recording the amount of the Progressive Jackpot.
- (7) Cards; number of decks
 - a. Except as provided in subparagraph (b) (7) (b) below, Let It Ride Poker shall be played with one deck of cards with backs of the same color and design and one additional cover card. The cover card shall be opaque and in a solid color readily distinguishable from the color of the backs and edges of the playing cards, as approved in writing by the SGA and the SGO. The deck of cards shall meet the requirements of Appendix B, Section 69.
 - b. Discard rack. In order to collect the cards at the conclusion of a round of play and at such other times as provided in the Compact and its Appendices, each Let It Ride Poker table shall have a discard rack securely attached to the top of the Dealer's side of the table. The height of each discard rack shall equal the height of the cards, stacked one on top of the other, contained in one decks; provided, however, that a taller discard rack may be used if such rack has a distinct and clearly visible mark on its side to show the exact

height for a stack of cards equal to the total number of cards contained in one deck.

c. If an automated card shuffling device is used, the Nation Gaming Operation shall be permitted to use a second deck of cards to play the game, provided that:

1. Each deck of cards complies with the requirements of Appendix B, Section 69;
2. The backs of the cards in the two decks are of different color;
3. One deck is being Shuffled by the automated card shuffling device while the other deck is being dealt or used to play the game;
4. Both decks are continuously alternated in and out of play, with each deck being used for every other round of play; and
5. The cards from only one deck shall be placed in the discard rack at any given time.

(c) Let It Ride poker rankings

(1) The rank of the cards used in Let It Ride poker, for the determination of winning Hands, in order of highest to lowest rank, shall be: Ace, King, Queen, Jack, 10, 9, 8,

7, 6, 5, 4, 3 and 2. Notwithstanding the foregoing, an ace may be used to complete a "straight flush" or

"straight" formed with a 2, 3, 4 and 5. be All suits shall considered equal in rank.

- (2) The permissible poker Hands at the game of Let It Ride Poker, in order of highest to lowest rank, shall be:
- a. "Royal flush" is a Hand consisting of an Ace, King, Queen, Jack and 10 of the same suit;
 - b. "Straight flush" is a Hand consisting of five cards of the same suit in consecutive ranking;
 - c. "Four-of-a-kind" is a Hand consisting of four cards of the same rank;
 - d. "Full house" is a Hand consisting of "three-of-a-kind" and a "pair";
 - e. "Flush" is a Hand consisting of five cards of the same suit;
 - f. "Straight" is a Hand consisting of five cards of consecutive rank, with an Ace, King, Queen, Jack and 10 being the highest ranking straight and an Ace, 2, 3, 4 and 5 being the lowest ranking straight; provided, however, that an Ace may not be combined with any other sequence of cards for purposes of determining a winning Hand (for example, Queen, King, Ace, 2, 3);
 - g. "Three-of-a-kind" is a Hand consisting of three

cards of the same rank;

h. "Two pairs" is a Hand consisting of two "pairs"; and

i. "One pair" is a Hand containing two cards of the same rank.

(d) Opening of the table for gaming

(1) After receiving a deck of cards at the table, the Dealer shall sort and inspect the cards, and the floorperson assigned to the table shall visually verify that inspection.

(2) Following the inspection of the cards by the Dealer and the verification by the floorperson assigned to the table, the cards shall be spread out face up on the table for visual inspection by the first player to arrive at the table. The cards shall be spread out according to suit and in sequence.

(3) After the first player has been afforded an opportunity to visually inspect the cards, the cards shall be turned face down on the table, mixed thoroughly by a "Washing" of the cards and stacked. Once the cards have been stacked, they shall be Shuffled.

(4) If the Nation Gaming Operation uses an automated card shuffling device to play the game and two decks of cards are received at the table, each deck of cards shall be

separately sorted, inspected, verified, spread, inspected, mixed, stacked and Shuffled in accordance with the provisions of paragraphs (d) (1) through (d) (3) above.

- (5) All cards opened for use on a table and dealt from a manual or automated dealing shoe shall be changed at least once every eight hours. All cards opened for use on a table and dealt from the Hand shall be changed at least every four hours.
 - (6) Procedures for compliance with this subdivision shall be approved in writing by the SGA.
- (e) Shuffle and cut of the cards
- (1) Immediately prior to the commencement of play and after each round of play has been completed, the Dealer shall Shuffle the cards, either manually or by use of an automated card shuffling device, so that the cards are randomly intermixed. Upon completion of the Shuffle, the Dealer or device shall place the deck of cards in a single stack; provided, however, that nothing in this section shall be deemed to prohibit the use of an automated card shuffling device which, upon completion of the shuffling of the cards, inserts the stack of cards directly into a dealing shoe.
 - (2) After the cards have been Shuffled and stacked, the Dealer shall:
 - a. If the cards were Shuffled using an automated card

shuffling device, deal or deliver the cards; or

- b. If the cards were Shuffled manually, cut the cards in accordance with the procedures set forth in paragraph (e) (3) below.

(3) If a cut of the cards is required, the Dealer shall:

a. Cut the deck, using one hand, by:

1. Placing the cover card on the table in front of the deck of cards;
2. Taking a stack of at least 10 cards from the top of the deck and placing them on top of the cover card;
3. Placing the cards remaining in the deck on top of the stack of cards that were cut and placed on top of the cover card pursuant to clause (e) (3) (a) (2) above; and
4. Removing the cover card and placing it in the discard rack; and

b. Deal the cards.

(4) Notwithstanding paragraph (e) (3) above, after the cards have been cut but before any cards have been dealt, a Gaming Facility Supervisor may require that the cards be recut if he or she determines that the cut was performed improperly or in any way that might affect the integrity

or fairness of the game.

- (5) Whenever there is no gaming activity at a Let It Ride Poker table which is open for gaming, the cards shall be spread out on the table either face up or face down. If the cards are spread face down, they shall be turned face up once a player arrives at the table. After the first player is afforded an opportunity to visually inspect the cards, the procedures outlined in subdivision (e) above shall be completed.

(f) Wagers

- (1) All wagers at Let It Ride Poker shall be made by placing gaming chips and, if applicable, a Match Play Coupon on the appropriate betting areas of the table Layout.
- (2) Only players who are seated at a Let It Ride Poker table may wager at the game. Once a player has placed his or her wagers and received cards, that player must remain seated until the completion of the round of play.
- (3) All wagers shall be placed prior to the Dealer announcing "No more bets." Except as provided in paragraph (e) (4) below, no wager shall be made, increased, or withdrawn after the Dealer has announced "No more bets."
- (4) At the beginning of each round of play, each player shall be required to place three equal but separate wagers. The wagers shall be identified as bet number one, bet number two and bet number three. Bet number one and bet

number two may subsequently be removed by the player in accordance with the provisions of subdivision (j), below.

- (5) The Nation Gaming Operation may, in its discretion, permit a player to place wagers at two betting positions during a round of play, provided that the two betting positions are adjacent to each other and no other patron is waiting to be seated.

(g) Optional bonus wager

- (1) The Nation Gaming Operation may, in its discretion, offer to each player at a Let It Ride Poker table the option to make an additional "bonus wager" that the player will receive a poker Hand with a rank of three-of-a-kind or better; provided, however, that the Nation Gaming Operation shall provide adequate notice, to the SGA and the SGO and to patrons prior to withdrawing such option.
- (2) Prior to the Dealer announcing "No more bets," each player who has placed the three wagers required by subdivision (f) may make an additional bonus wager by placing a \$1.00 gaming chip on or in the approved wagering device designated for that wager.
- (3) All winning bonus wagers shall be paid in accordance with the Payout schedule in subdivision (k).
- (4) A bonus wager shall have no bearing on any other wager made by a player at the game of Let It Ride Poker.

(h) Procedures for dealing Let It Ride Poker

- (1) Dealing the cards from a manual dealing shoe
 - a. If the Nation Gaming Operation chooses to have the cards dealt from a manual dealing shoe, the dealing shoe shall meet the requirements of Appendix B, Section 71 and shall be located on the table in a location as approved in writing by the SGA. Once the procedures required by subdivision (e) above have been completed, the stacked deck of cards shall be placed in the dealing shoe either by the Dealer or by an automated card shuffling device.
 - b. The Dealer shall announce "No more bets" prior to dealing any cards. If any optional bonus wagers have been made, the Dealer shall also collect these wagers from the approved wagering devices and shall then verify, on the Layout in front of the table inventory container, that the number of gaming chips wagered equals the number of wagers acknowledged or accepted by the wagering devices. The Dealer shall then place the bonus wager gaming chips into the table inventory container.
 - c. In dealing the cards, each card shall be removed from the dealing shoe with the Hand of the Dealer that is closest to the dealing shoe and placed on the appropriate area of the Layout with the opposite hand. The Dealer shall, starting with the player farthest to his or her left and continuing around the table in a clockwise manner, deal the cards as follows:

1. One card face down to each player who has placed three wagers in accordance with subdivision (f) above;
 2. One card face down to the area designated for the placement of the community cards to the left of the Dealer;
 3. A second card face down to each player who has placed three wagers in accordance with subdivision (f) above;
 4. A second card face down to the area designated for the placement of the community cards, which card shall be placed to the right of the first card dealt to this area; and
 5. A third card face down to each player who has placed three wagers in accordance with subdivision (f) above.
- d. After three cards have been dealt to each player and two cards have been dealt to the area designated for the placement of the community cards, the Dealer shall remove the Stub from the manual dealing shoe and, except as provided in subparagraph (h) (1) (e) below, place the Stub in the discard rack without exposing the card faces.
- e. The Dealer shall be required to count the Stub at least once every five rounds of play in order to determine that the correct number of cards are

still present in the deck. The Dealer shall determine the number of cards in the Stub by counting the cards face down on the Layout.

1. If the count of the Stub indicates that 52 cards are in the deck, the Dealer shall place the Stub in the discard rack without exposing the cards.
 2. If the count of the Stub indicates that the number of cards in the deck is incorrect, the Dealer shall determine if the cards were misdealt. If the cards have been misdealt (a player or the area designated for the placement of the community cards has more or less than three cards) but 52 cards remain in the deck, all Hands shall be void. If the cards have not been misdealt, all Hands shall be considered void and the entire deck of cards shall be removed from the table.
- f. Notwithstanding the provisions of subparagraph (h) (1) (e) above, the counting of the Stub shall not be required if an automated card shuffling device is used that counts the number of cards in the deck after the completion of each Shuffle and indicates whether 52 cards are still present. If the automated card shuffling device reveals that an incorrect number of cards are present, the deck shall be removed from the table.

(2) Procedures for dealing the cards from the Hand

- a. Notwithstanding any other provision of this Compact, the Nation Gaming Operation may, in its discretion, permit a Dealer to deal the cards used to play Let It Ride poker from his or her Hand.
- b. If the Nation Gaming Operation chooses to have the cards dealt from the Dealer's Hand, the following requirements shall be observed.
 1. The Nation Gaming Operation shall use an automated shuffling device to Shuffle the cards.
 2. Once the procedures required by subdivision (e) above have been completed, the Dealer shall place the stacked deck of cards in either hand.
 - A. Once the Dealer has chosen the hand in which he or she will hold the cards, the Dealer shall use that hand whenever holding the cards during that round of play.
 - B. The cards held by the Dealer shall at all times be kept in front of the Dealer and over the table inventory container.
 3. The Dealer shall then announce "No more bets" prior to dealing any cards. If any optional bonus wagers have been made, the Dealer shall also collect these wagers from the approved

wagering devices and shall then verify, on the Layout in front of the table inventory container, that the number of gaming chips wagered equals the number of wagers acknowledged or accepted by the wagering devices. The Dealer shall then place the gaming chips into the table inventory container.

- c. The Dealer shall deal each card by holding the deck of cards in the chosen hand and using the other hand to remove the top card of the deck and place it face down on the appropriate area of the Layout. The Dealer shall, starting with the player farthest to his or her left and continuing around the table in a clockwise manner, deal the cards as follows:
 1. One card face down to each player who has placed three wagers in accordance with subdivision (f);
 2. One card face down to the area designated for the placement of the community cards to the left of the Dealer;
 3. A second card face down to each player who has placed three wagers in accordance with subdivision (f);
 4. A second card face down to the area designated for the placement of the community cards, which card shall be placed to the right of the

first card dealt to this area; and

5. A third card face down to each player who has placed three wagers in accordance with subdivision (f).
 - d. After three cards have been dealt to each player and two cards have been dealt to the area designated for the placement of the community cards, the Dealer shall, except as provided in subparagraph (h) (2) (e) below, place the Stub in the discard rack without exposing the cards.
 - e. The Dealer shall be required to count the Stub at least once every five rounds of play in order to determine that the correct number of cards are still present in the deck. The Dealer shall count the Stub in accordance with the provisions of subparagraph (h) (1) (e).
 - f. Notwithstanding the provisions of subparagraph (h) (1) (e) above, the counting of the Stub shall not be required if an automated card shuffling device is used that counts the number of cards in the deck after the completion of each Shuffle and indicates whether 52 cards are still present. If the automated card shuffling device reveals that an incorrect number of cards are present, the deck shall be removed from the table.
- (3) Procedures for dealing the cards from an automated dealing shoe

- a. Notwithstanding any other provision of the Compact, the Nation Gaming Operation may, in its discretion, choose to have the cards used to play Let It Ride Poker dealt from an automated dealing shoe which dispenses cards in stacks of three cards, provided that the shoe, its location and the procedures for its use are approved in writing by the SGA.
- b. If the Nation Gaming Operation chooses to have the cards dealt from an automated dealing shoe, the following requirements shall be observed.
 1. Once the procedures required by subdivision (e) above have been completed, the cards shall be placed in the automated dealing shoe.
 2. Prior to the shoe dispensing any stacks of cards, the Dealer shall then announce "No more bets." If any optional bonus wagers have been made, the Dealer shall also collect these wagers from the approved wagering devices and shall then verify, on the Layout in front of the table inventory container, that the number of gaming chips wagered equals the number of wagers acknowledged or accepted by the wagering devices. The Dealer shall then place the gaming chips into the table inventory container.
- c. The Dealer shall deliver the first stack of three cards dispensed by the automated dealing shoe face down to the player farthest to his or her left who

has placed three wagers in accordance with subdivision (f) above. As the remaining three card stacks are dispensed to the Dealer by the automated dealing shoe, the Dealer shall, moving clockwise around the table, deliver a stack face down to each of the other players who has placed three wagers. The Dealer shall then deliver a stack of three cards face down to the area designated for the placement of the community cards. The top card shall be placed face down into the box designated for community cards on the Dealer's left, the second (middle) card shall be placed face down into the box designated for community cards on the Dealer's right, and the third (bottom) card shall be burned by placing it face down in the discard rack without revealing its value.

- d. After each stack of three cards has been dispensed and delivered in accordance with subparagraph (3) (c) above, the Dealer shall remove the Stub from the automated dealing shoe and, except as provided in subparagraph (h) (3) (e) below, place the cards in the discard rack without exposing the cards.
- e. The Dealer shall be required to count the Stub at least once every five rounds of play in order to determine that the correct number of cards are still present in the deck. The Dealer shall count the Stub in accordance with the provisions of paragraphs (h) (1) (5) and (h) (1) (6) above.

- f. Notwithstanding the provisions of subparagraph (h) (3) (e) above, the counting of the Stub shall not be required if an automated card shuffling device is used that counts the number of cards in the deck after the completion of each Shuffle and indicates whether 52 cards are still present. If the automated card shuffling device reveals that an incorrect number of cards are present, the deck shall be removed from the table.
- (i) Procedures for completion of each round of play
 - (1) After the dealing procedures have been completed, each player shall examine his or her cards.
 - a. Each player who wagers at Let It Ride poker shall be responsible for his or her own Hand and no person other than the Dealer may touch the cards of that player.
 - b. Each player shall be required to keep his or her three cards above the table and in full view of the Dealer at all times.
 - c. After each player has made a decision regarding bet number two pursuant to paragraph (i) (5) below each player's cards shall be placed face down on the appropriate area of the Layout, and the player shall not touch the cards again.
 - (2) After each player has examined his or her cards, the Dealer shall, beginning with the player farthest to the

Dealer's left and moving clockwise around the table, ask each player if he or she wishes to withdraw bet number one or Let It Ride.

- a. If a player chooses to let bet number one ride, that bet shall remain on the appropriate betting area of the Layout until the end of the round of play.
- b. If a player chooses to withdraw bet number one, the Dealer shall move the gaming chip(s) on the betting area designated for bet number one toward the player who shall then immediately remove the gaming chip(s) from the betting area.

(3) The Dealer shall then turn the community card that is to his or her left face up. The exposed card shall become the first community card.

(4) After the first community card is exposed, the Dealer shall, beginning with the player farthest to the Dealer's left and moving clockwise around the table, ask each player if he or she wishes to withdraw bet number two or Let It Ride. This decision shall be made by each player regardless of the decision made concerning bet number one.

- a. If a player chooses to let bet number two ride, that bet shall remain on the appropriate betting area of the Layout until the end of the round of play.

- b. If a player chooses to withdraw bet number two, the Dealer shall move the gaming chip(s) on the betting area designated for bet number two toward the player who shall then immediately remove the gaming chip(s) from the betting area.
- (5) The Dealer shall then turn the second community card face up.
 - (6) After the second community card is turned face up, the Dealer shall, beginning with the player farthest to his or her right and continuing around the table in a counterclockwise direction, turn the three cards of each player face up.
 - a. The two community cards and the three cards dealt to each player shall form the five card poker Hand of each player.
 - b. The Dealer shall examine the cards of each player to determine if the player's Hand qualifies for a Payout.
 - (7) Any wager on a Hand which has a rank that is lower than a pair of tens shall be a losing wager. All losing wagers shall be immediately collected by the Dealer and placed in the table inventory container. The cards of any player who has made a losing wager shall be collected and placed in the discard rack.
 - (8) After all losing wagers have been collected, all winning

wagers, including any winning bonus wagers, shall be paid. All winning Hands shall remain face up on the Layout until all winning wagers have been paid by the Dealer. Each winning wager that remains on the table shall be paid in accordance with the Payout odds listed in subdivision (j) or as otherwise approved in writing by the SGA and the SGO.

- a. The Dealer shall pay all winning wagers beginning with the player farthest to the right of the Dealer and continuing counterclockwise around the table.
- b. After paying all winning wagers, the Dealer shall immediately collect the cards of all winning players and the community cards and place them in the discard rack.

(9) All cards collected by the Dealer shall be picked up in order and placed in the discard rack in such a way that they can be readily arranged to reconstruct each Hand in the event of a question or dispute.

(j) Payout odds

(1) The Payout odds for winning wagers at Let It Ride poker printed on any Layout or in any brochure or other publication distributed by the Nation Gaming Operation shall be stated through the use of the word "to" or "win, 11 and no odds shall be stated through the use of the word "for."

(2) Subject to the Payout limitation in paragraph (j) (3)

below, the Nation Gaming Operation shall pay off each winning wager at the game of Let It Ride poker at no less than the following odds:

<u>Wager</u>	<u>Payout Odds</u>
Royal Flush	1,000 to 1
Straight Flush	200 to 1
Four-of-a-kind	50 to 1
Full House	11 to 1
Flush	8 to 1
Straight	5 to 1
Three-of-a-kind	3 to 1
Two Pair	2 to 1
Pair of 10s, Jacks, Queens, Kings or Aces	1 to 1

(3) Notwithstanding the minimum Payout odds required in paragraph (j) (2) above, the Nation Gaming Operation may establish a maximum amount of \$50,000.00 or such greater amount as approved in writing by the SGA that is payable to a player on a single Hand. If the established Payout limit is not included on the Layout, the Nation Gaming Operation shall provide notice, as approved in writing by

the SGA, of any change in the Payout limit. Any maximum Payout limit established by the Nation Gaming Operation shall apply only to Payouts of Let It Ride poker non-bonus wagers.

- (4) The Nation Gaming Operation shall pay off each winning bonus wager at no less than the following monetary amounts:

<u>Wager</u>	<u>Bonus Payout</u>
Royal Flush	\$25,000.00
Straight Flush	\$2,500.00
Four-of-a-kind	\$400.00
Full House	\$200.00
Flush	\$50.00
Straight	\$25.00
Three-of-a-kind	\$5.00

(k) Irregularities

(1) A card that is found face up in the shoe or the deck while the cards are being dealt shall not be used in the game and shall be placed in the discard rack. If more than one card is found face up in the shoe or the deck

during the dealing of the cards, all Hands shall be void and the cards shall be reshuffled.

- (2) A card drawn in error without its face being exposed shall be used as though it was the next card from the shoe or the deck.
- (3) If any player or the area designated for the placement of the community cards is dealt an incorrect number of cards, all Hands shall be void and the cards shall be reshuffled.
- (4) If an automated card shuffling device is being used and the device jams, stops shuffling during a Shuffle, or fails to complete a Shuffle cycle, the cards shall be reshuffled in accordance with procedures approved by the SGA in writing.
- (5) If an automated dealing shoe is being used and the device jams, stops dealing cards, or fails to deal all cards during a round of play, the round of play shall be void and the cards shall be removed from the device and reshuffled with any cards already dealt, in accordance with procedures approved by the SGA in writing.
- (6) Any automated card shuffling device or automated dealing shoe shall be removed from from a gaming table before any other method of shuffling or dealing may be utilized at that table.

(1) Minimum wagers and maximum wagers.

The Nation Gaming Operation shall determine the minimum and maximum wagers at each table. The amounts of the minimum and maximum wagers shall be conspicuously posted on a sign at each table.

14. Minibaccarat

(a) Equipment.

- (1) Table. Minibaccarat shall be played at a table having on one side places for the players and on the opposite side a place for the Dealer. Each Minibaccarat table shall have a Drop Box and a tip box attached to the Dealer's side of the gaming table, but on opposite sides of the Dealer, as approved in writing by the SGA and the SGO.
- (2) Layout. A Layout for a Minibaccarat table shall be approved in writing by the SGA and the SGO and shall contain, at a minimum:
 - a. The name, trade name or logo of the Nation Gaming Operation;
 - b. Numbered areas that correspond to the seat numbers for the purpose of marking Vigorish; and
 - c. An area designated for the placement of cards for the "Player's" and "Banker's" Hands.
- (3) A dealing shoe, which shall meet the requirements of Appendix B, Section 71.
- (4) Discard rack. In order to collect the cards at the conclusion of a round of play and at such other times as provided in the Compact and its Appendices, each Minibaccarat table shall have a discard rack securely attached to the top of the Dealer's side of the table.

The height of each discard rack shall equal the height of the cards, stacked one on top of the other, contained in the total number of decks that are to be used in the dealing shoe at that table; provided, however, that a taller discard rack may be used if such rack has a distinct and clearly visible mark on its side to show the exact height for a stack of cards equal to the total number of cards contained in the number of decks to be used in the dealing shoe at that table. Whenever a double shoe is used at a Minibaccarat table, the same number of decks shall be used in each side of the double shoe, and the height and marking requirements as set forth above for the table's discard rack shall be determined from the number of decks used in one side of the shoe.

- (5) Automated card shuffling device (Optional). An automated card shuffling device is a device which can automatically perform a Shuffle. Such a device shall meet the requirements of Appendix B, Section 71.

- (6) Cards; number of decks; value; point count of Hand
 - a. Minibaccarat shall be played with at least six (6) decks of cards, which shall meet the requirements of Appendix B, Section 69, and two additional cutting cards. The cutting cards shall be opaque and in a solid color readily distinguishable from the color of the backs and edges of the playing cards, as approved in writing by the SGA and the SGO.

b. The "Value" of the cards in each deck shall be as follows:

1. Any card from 2 to 9 shall have its face value;
2. Any 10, Jack, Queen or King shall have a value of 0; and
3. Any Ace shall have a value of 1.

c. The "Point Count" of a Hand shall be a single digit number from 0 to 9 inclusive and shall be determined by totaling the value of the cards in the Hand. If the total of the cards in a Hand is a two-digit number, the left digit of such number shall be discarded having no value and the right digit shall constitute the Point Count of the Hand. Examples of this rule are as follows:

1. A Hand composed of an Ace, a 2 and a 4 has a Point Count of 7; and
2. A Hand composed of an Ace, a 2 and a 9 has a total of 12 but only a Point Count of 2 since the digit 1 in the number 12 is discarded.

(d) If an automated card shuffling device is utilized, minibaccarat shall be played with at least 12 decks of cards in accordance with the following requirements:

1. Each deck of cards shall meet the requirements of Appendix B, Section 69;
 2. The cards shall be separated into two batches, with an equal number of decks included in each batch;
 3. The backs of the cards in each batch shall be of the same color and design, but of a different color than the cards included in the other batch;
 4. One batch of cards shall be Shuffled and stored in the automated card shuffling device while the other batch is being dealt or used to play the game;
 5. Both batches of cards shall be continuously alternated in and out of play, with each batch being used for every other dealing shoe; and
 6. The cards from only one batch shall be placed in the discard rack at any given time.
- e. All cards opened for use on a table and dealt from a manual or automated dealing shoe shall be changed at least once every eight hours. All cards opened for use on a table and dealt from the Hand shall be changed at least every four hours.

(b) Types of wagers

- (1) The following wagers shall be permitted to be made by a participant at the game of minibaccarat:
- a. A wager on the "Banker's Hand" which shall:
 - 1. Win if the "Banker's Hand" has a Point Count higher than that of the "Player's Hand";
 - 2. Lose if the "Banker's Hand" has a Point Count lower than that of the "Player's Hand"; and
 - 3. Either be a "push" or, if the Nation Gaming Operation so charges, be charged a Vigorish equal to twenty-five (25) percent of the wager, if the Point Count of the "Banker's Hand" and the "Player's Hand" are equal.

 - b. A wager on the "Player's Hand" which shall:
 - 1. Win if the "Player's Hand" has a Point Count higher than that of the "Banker's Hand";
 - 2. Lose if the "Player's Hand" has a Point Count lower than that of the "Banker's Hand"; and
 - 3. Be a "push" if the Point Count of the "Banker's Hand" and the "Player's Hand" are equal.

 - c. A "Tie Bet" which shall win if the Point Counts of the "Banker's Hand" and the "Player's Hand" are equal and shall lose if such Point Counts are not

equal.

(5) Unless otherwise approved in writing by the SGA and the SGO, the Nation Gaming Operation shall not accept any wager at the game of minibaccarat other than those specified in paragraph (b) (1) above.

(6) All wagers at minibaccarat shall be made by placing gaming chips and, if applicable, a Match Play Coupon on the appropriate areas of the minibaccarat Layout.

(7) No wager at minibaccarat shall be made, increased or withdrawn after the Dealer has announced "No More Bets".

(5) Once the first card of any Hand has been removed from the shoe by the Dealer, no participant shall handle, remove or alter any wagers that have been made until a decision has been rendered and implemented with respect to that wager.

(c) Payout odds; Vigorish

(1) A winning wager made on the "Player's Hand" shall be paid off by the Nation Gaming Operation at odds of 1 to 1.

(2) A winning tie bet shall be paid off by the Nation Gaming Operation at odds of at least 8 to 1.

(3) Except as otherwise provided in paragraphs (c) (4) and

(c) (6) below, a winning wager made on the "Banker's Hand" shall be paid off by the Nation Gaming Operation at odds

of 1 to 1, except that the Nation Gaming Operation shall extract a Vigorish from the winning player in an amount equal to, in the Nation Gaming Operation's discretion, either four or five percent of the amount won.

- a. When collecting the Vigorish, the Nation Gaming Operation may round off the Vigorish to five cents or the next highest multiple of five cents.
 - b. The Nation Gaming Operation may collect the Vigorish from a player at the time the winning Payout is made or may defer it to a later time; provided, however, that all outstanding Vigorish shall be collected prior to reshuffling the cards in a shoe. The amount of any Vigorish not collected at the time of the winning Payouts shall be evidenced by the placing of a coin or marker button containing the amount of the Vigorish owed in a rectangular space in front of the Dealer on the Layout imprinted with the number of the player owing such Vigorish. The coin or marker button shall not be removed from the Layout and play shall not resume until the Vigorish owed is collected.
- (4) The Nation Gaming Operation may, in its discretion, charge every player at a minibaccarat table a Vigorish equal to 25 percent of the player's wager on the "Banker's Hand" if the Point Counts of the "Banker's Hand" and the "Player's Hand" are equal. The Vigorish authorized by this subsection shall be collected at the end of the round of play and prior to any cards being

dealt for the next round of play.

- (5) The Nation Gaming Operation shall provide notice of any change in the type of Vigorish being charged or increase in the percentage of Vigorish being charged at each minibaccarat table. The type and percentage of Vigorish charged at a minibaccarat table shall apply to all players at that table.
- (6) Notwithstanding paragraphs (c) (3) through (c) (5) above, the Nation Gaming Operation may, in its discretion, pay a winning wager made on the "Banker's Hand" at odds of 1 to 1 and not collect any Vigorish from the winning player provided that any winning wager on a "Banker's Hand" that has a Point Count of six shall be paid off by the Nation Gaming Operation at odds of 1 to 2. If the Nation Gaming Operation elects to offer this no Vigorish variation of the game of minibaccarat it must post such notice in a manner required by the SGA.

(d) Opening of table for gaming

- (1) After receiving the six or more decks of cards at the table, the Dealer calling the game shall sort and inspect the cards and the floorperson assigned to the table shall visually verify the inspection.
- (2) Following the inspection of the cards by the Dealer and the verification by the floorperson assigned to the table, the cards shall be spread out face upwards on the table for visual inspection by the first participant or participants to arrive at the table. The cards shall be

spread out in horizontal rows by deck according to suit and in sequence. The cards in each suit shall be laid out in sequence within the suit.

- (3) After the first participant or participants are afforded an opportunity to visually inspect the cards, the cards shall be turned face downward on the table, mixed thoroughly by a "Washing" of the cards and stacked.
- (4) If an automated shuffling device is utilized, all the decks in one batch of cards shall be spread for inspection on the table separate from the decks in the other batch of cards. After the player or players is afforded an opportunity to visually inspect the cards, each batch of cards shall separately be turned face downward on the table, washed and stacked.

(e) Shuffle and cut of the cards

- (1) Immediately prior to the commencement of play and after each shoe of cards is completed, the Dealer shall Shuffle the cards so that they are randomly intermixed.
- (2) After the cards have been Shuffled, the Nation Gaming Operation shall require the Dealer, at its option, to either:
 - a. Leave the entire stack of cards intermixed but not entirely squared off ("feathered") so that the floorperson can verify that the Shuffle did not result in any uneven distribution of cards; or

- b. Lace approximately one deck of cards so that they are evenly dispersed into the remaining stack. After lacing the cards, the Nation Gaming Operation may, as an additional option, require the Dealer to Shuffle some or all of the cards again.
- (3) Any shuffling or lacing option chosen for use by the Nation Gaming Operation pursuant to paragraph (e) (2) above shall be implemented at all tables within a Pit.
 - (4) After shuffling or lacing the cards and, where applicable, reshuffling them, the Dealer shall offer the stack of cards, with backs facing away from the Dealer, to the participants to be cut. The Dealer shall begin with the participant seated in the highest number position at the table and, working clockwise around the table, shall offer the stack to each participant until a participant accepts the cut. If no participant accepts the cut, the Dealer shall cut the cards.
 - (5) The cards shall be cut by placing the cutting card in the stack at least 10 cards in from either end.
 - (6) Once the cutting card has been inserted into the stack, the Dealer shall take all cards in front of the cutting card and place them to the back of the stack. The Dealer shall then insert one cutting card in a position at least 14 cards in from the back of the stack, and the second cutting card at the end of the stack. The stack of cards shall then be inserted into the dealing shoe for commencement of play. Prior to commencement of play, the Dealer shall remove the first card from the shoe and

place it, and an additional amount of cards equal to the amount on the first card drawn, in the discard rack after all cards have been shown to the participants. Face cards and tens count as ten. Aces count as one.

- (7) After the cards have been cut but before any cards have been dealt, a Gaming Facility Supervisor may require the cards to be recut if he or she determines that the cut was performed improperly or in any way that might affect the integrity or fairness of the game. If a recut is required, the cards shall be recut, at the Nation Gaming Operation's option, by the player who last cut the cards, or by the next person entitled to cut the cards, as determined by paragraph (e) (4) above.
- (8) If there is no gaming activity at a minibaccarat table which is open for gaming, the cards shall be removed from the dealing shoe and the discard rack, and spread out on the table either face up or face down. If the cards are spread face down, they shall be turned face up once a player arrives at the table. After the first player is afforded an opportunity to visually inspect the cards, the cards shall be turned face downward on the table and washed
 - a. If there is no automated shuffling device in use, the cards shall be stacked, then Shuffled and cut in accordance with this section.
 - b. If an automated shuffling device is in use, the cards shall be stacked and placed into the automated shuffling device to be Shuffled. The

batch of cards already in the Shuffler shall then be removed. Unless a player so requests, the batch of cards removed from the Shuffler need not be spread for inspection and reshuffled prior to being dealt, if:

1. The automated card shuffling device stores a single batch of Shuffled cards inside the Shuffler in a secure manner approved in writing by the SGA and the SGO; and
2. The Shuffled cards have been secured, released and prepared for play in accordance with procedures approved in writing by the SGA.

(f) Dealing shoe

All cards used to game at minibaccarat shall have backs of the same color and design and shall be dealt from a dealing shoe specifically designed for such purpose in accordance with Appendix B, Section 71.

(g) Hands of player and banker; procedure for dealing initial two cards to each Hand

- (1) There shall be two Hands dealt in the game of minibaccarat; one shall be designated the "Player's Hand" and the other designated the "Banker's Hand".
- (2) At the commencement of each round of play, the Dealer calling the game shall announce "No More Bets".

- (3) The Dealer shall deal an initial four cards from the shoe. The first and third cards dealt shall constitute the first and second cards of the "Player's Hand." The second and fourth cards dealt shall constitute the first and second cards of the "Banker's Hand." The Nation Gaming Operation may deal the initial four cards in accordance with one of the following options:
- a. The Dealer shall remove cards from the shoe with his or her left hand, turn them face up and then place them on the appropriate area of the Layout with his or her right hand. The first and third cards dealt shall be placed on the area designated for the "Player's Hand" and the second and fourth cards dealt shall be placed on the area designated for the "Banker's Hand";
 - b. The first and third cards dealt shall be placed face down on the area designated for the "Player's Hand" and the second and fourth cards dealt shall be placed face down underneath the right corner of the dealing shoe until the "Player's Hand" is called, at which time the second and fourth cards shall be turned face up and placed on the area designated for the "Banker's Hand"; or
 - c. The first and third cards dealt shall be placed face down on the area designated for the "Player's Hand" and the second and fourth cards dealt shall be placed face down on the area designated for the "Banker's Hand." After all four cards have been

dealt, the Dealer shall place the "Banker's Hand" underneath the right corner of the dealing shoe until the "Player's Hand" is called.

1. The Dealer shall then hand the two cards of the "Player's Hand," face down, to the player with the highest wager on the "Player's Hand." After viewing the "Player's Hand," the player shall return the two cards, face up, to the Dealer, who shall place the cards face up on the area designated for the "Player's Hand" and announce the point count of the "Player's Hand."
2. The Dealer shall then hand the two cards of the "Banker's Hand," face down, to the player with the highest wager on the "Banker's Hand." After viewing the "Banker's Hand," the player shall return the two cards, face up, to the Dealer, who shall place the cards face up on the area designated for the "Banker's Hand" and announce the point count of the "Banker's Hand."
3. Any third card required to be dealt to the "Player's Hand" shall be placed face down on the area designated for the "Player's Hand." The Dealer shall then hand the card, face down, to the player who was handed and returned the "Player's Hand." After viewing the card, the player shall return the card face up to the Dealer, who shall place the

card face up on the area designated for the "Player's Hand."

4. Any third card required to be dealt to the "Banker's Hand" shall be placed face down on the area designated for the "Banker's Hand." The Dealer shall then hand the card, face down, to the player who was handed and returned the "Banker's Hand." After viewing the card, the player shall return the card face up to the Dealer, who shall place the card face up on the area designated for the "Banker's Hand."

5. If two or more players offer to wager an equally high amount on the "Player's Hand." the player making such wager who is closest to the Dealer moving counterclockwise around the table shall be handed the "Player's Hand" and any third card required to be dealt. If two or more players offer to wager an equally high amount on the "Banker's Hand," the player making such wager who is closest to the Dealer moving counterclockwise around the table shall be handed the "Banker's Hand" and any third card required to be dealt.

(h) Procedure for dealing of additional cards

- (1) After the Dealer positions the cards, the Dealer shall announce the point count of the "Player's Hand" and then the "Banker's Hand." If the Dealer positions the cards in

accordance with subparagraph (g) (3) (c) above, the point counts of the "Player's Hand" and "Banker's Hand" shall be announced as provided therein.

- (2) Following the announcement of the Point Counts of each Hand, the Dealer shall determine whether to deal a third card to each Hand which instructions shall be in conformity with the requirements of subdivision (i) below.
- (3) If the Dealer positions the cards in accordance with subparagraph (g) (3) (a) or (g) (3) (b) above, any third card required to be dealt shall first be dealt face upwards to the "Player's Hand" and then to the "Banker's Hand" by the Dealer. If the Dealer positions the cards in accordance with subparagraph (g) (3) (c) above, any third cards required to be dealt shall be dealt as provided therein.
- (4) In no event shall more than one additional card be dealt to either Hand.
- (5) Whenever the cutting card appears during play, the cutting card will be removed and placed to the side and the Hand will be completed. Upon completion of that Hand, the Dealer calling the game shall announce "last Hand". At the completion of one more Hand, no more cards will be dealt until the reshuffle occurs.

(i) Rules for determining whether third card shall be dealt

- (1) If the Point Count of either the "Player's Hand" or the

"Banker's Hand" after the initial two cards are dealt to each is an 8 or 9 (which shall be called a "natural") no more cards shall be dealt to either Hand.

- (2) If the Point Count of the "Banker's Hand" on the first two cards is 0 to 7 inclusive, the "Player's Hand" shall draw (that is, take a third card), or stay (that is, not take a third card) in accordance with the requirements of Table 1 below.

TABLE 1

Player	Third Card Determination
0 to 5	Draws
6 to 9	Stays

- (3) If the Point Count of the "Player's Hand" on the first two cards is 6 or 7 (i.e. player stands), the "Banker's Hand" will always draw on totals of 0, 1, 2, 3, 4 and 5 and stand on totals 6, 7, 8, or 9.

- (4) The total of the initial two cards dealt to the "Banker's Hand" along with the third card dealt to the "Player's Hand" determines if a third card is dealt to the "Banker's Hand" in accordance with the requirements of Table 2 below:

TABLE 2

Banker Having	Draws when Player's	Does not draw when
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	3rd card is	Player's 3rd card is
0, 1, 2	always draws except when player has 8 or 9	
3	0-1-2-3-4-5-7-9	8
4	2-3-4-5-6-7	0-1-8-9
5	4-5-6-7	0-1-2-3-8-9
6	6-7	0-1-2-3-4-5-8-9
7	stands	stands
8-9	natural stand	natural stand

(5) The method of using Table 2 will be to find the Point Count of the "Banker's Hand" and trace that horizontally across the table until the point value of the Player's third card is located. The "Banker's Hand" will stand or draw as listed in vertical column 2 or 3 in accordance with the following:

- (a) The first vertical column in Table 2 labeled "Banker Having" will refer to the Point Count of the "Banker's Hand" after the first two cards have been dealt to it.
- (b) The second vertical column in Table 2 labeled "Draws when Player's 3rd card is" will refer to the value of the third card drawn by the "Player's

Hand" as distinguished from the Point Count of the "Player's Hand."

- (c) The third vertical column in Table 2 labeled "Does not draw when Player's 3rd card is" will refer to the value of the third card drawn by the "Player's Hand" as distinguished from the Point Count of the "Player's Hand."

- (j) Announcement of result of round; payment and collection of wagers
 - (1) After each Hand has received all the cards to which it is entitled, the Dealer shall announce the final Point Count of each Hand indicating which Hand has won the round. If two Hands have equal Point Counts, the Dealer shall announce "Tie Hand" .
 - (2) After the result of the round is announced, the Dealer responsible for the wagers on the table shall first collect each losing wager. Thereafter, the Dealer shall, in accordance with one of the following procedures, pay each winning wager and collect or mark any Vigorish owed.
 - a. Starting at the highest numbered player position at which a winning wager is located and proceeding in descending order to each next highest numbered player position, the Dealer shall first pay each winning wager and then, returning to the highest numbered player position at which a winning wager was located and proceeding in like order, mark or collect the Vigorish owed by each player.

- b. Starting at the highest numbered player position at which a winning wager is located and proceeding in descending order to each next highest numbered player position, the Dealer shall first mark or collect the Vigorish owed by each player and then, returning to the highest numbered player position at which a winning wager is located and proceeding in like order, pay each winning wager.
- c. Starting at the highest numbered player position at which a winning wager is located, the Dealer shall pay that player's winning wager and immediately thereafter mark or collect the Vigorish owed by that player and then, proceeding in descending order to the next highest numbered player position at which a winning wager is located, repeat this procedure until each winning wager is paid and the Vigorish owed by each player is either marked or collected.
- d. Starting at the highest numbered player position at which a winning wager is located, the Dealer shall mark or collect the Vigorish owed by that player and immediately thereafter pay that player's winning wager and then, proceeding in descending order to the next highest numbered player position at which a winning wager is located, repeat this procedure until the Vigorish owed by each player is either marked or collected and each winning wager is paid.

(3) Nation Gaming Operation may, in its discretion, elect to

use any of the procedures authorized in subparagraph (j) (2) (b) above at any minibaccarat table in its establishment; provided, however, that:

- a. The same procedure shall be used for all minibaccarat tables located within the same gaming Pit;
 - b. Any minibaccarat table located in a gaming Pit that also contains a baccarat table shall use the same procedure that is to be used at baccarat; and
 - c. The SGA, the SGO and the surveillance department shall be notified, in writing, at least 30 minutes prior to the implementation of or a change in the particular procedure to be used at a table or gaming Pit.
- (4) At the conclusion of a round of play, all cards on the Layout shall be picked up by the Dealer and placed in the discard rack, in order and in such a way that they can be readily arranged to indicate the "Player's Hand" and the "Banker's Hand" in case of question or dispute.
- (5) No participant or spectator shall handle, remove or alter any cards used to game at minibaccarat and no Dealer or other gaming facility employee shall permit a participant or spectator to engage in such activity.

(k) Irregularities

- (1) A third card dealt to the "Player's Hand", when no third

card is authorized by these regulations, shall become the third card of the "Banker's Hand" if the "Banker's Hand" is obliged to draw by Table 2 of subdivision (i). If, in such circumstances, the "Banker's Hand" is required to stay, the card dealt in error shall become the first card of the next Hand unless it has been disclosed. In such case, the disclosed card and an additional number of cards equal to the amount on this card shall be drawn face upwards from the shoe and placed in the discard rack.

- (2) A card drawn in error from the shoe, if not disclosed, shall be used as the first card of the next Hand of play. If the card has been disclosed, a burn card procedure as described in paragraph (k) (1) above, shall be implemented.
- (3) All cards found face upwards in the shoe shall not be used in the game and shall be placed in the discard rack, along with an additional amount of cards drawn face upwards, which agrees with the number on the cards found face upwards in the shoe.
- (4) If there are insufficient cards remaining in the shoe to complete a round of play, that round shall be void and a new round shall commence after the entire set of cards are washed, reshuffled, stacked and placed in the shoe.
- (5) The Dealer or floorperson assigned to the table may require any player to relinquish the right to turn over the cards pursuant to subparagraph (g) (3) (c) above, if the player unreasonably delays the game or violates

either the Compact or its Appendices. Whenever the voluntary or compulsory relinquishment of that right occurs, the Dealer shall offer it to the player immediately to the right of the previous player, and, if he or she does not accept it or there is no player in that position, the Dealer shall offer it to each of the other players in turn counterclockwise around the table for the remainder of that round of play. If no player accepts the cards, the Dealer shall turn the cards over and place them on the designated areas of the Layout.

(1) Continuous shuffling shoe or device

In lieu of the dealing and shuffling requirements set forth above, the Nation Gaming Operation may utilize a dealing shoe or other device designed to automatically reshuffle the cards provided that such shoe or device is approved in writing by the SGA and the SGO.

(m) Minimum wagers and maximum wagers.

The Nation Gaming Operation shall determine the minimum and maximum wagers at each table. The amounts of the minimum and maximum wagers shall be conspicuously posted on a sign at each table.

15. Pai Gow Poker

- (a) Definitions. The following words and terms, when used in this section, shall have the following meanings unless the context clearly indicates otherwise.
- (1) "Copy Hand" shall mean either a two card Hand or a five card Hand of a player which is identical in rank to the corresponding two card Hand or five card Hand of the Dealer.
 - (2) "High Hand" shall mean the five card Hand which is formed from the seven cards dealt at the game of pai gow poker so as to rank equal to or higher than the two card low Hand.
 - (3) "Low Hand" shall mean the two card Hand which is formed from the seven cards dealt at the game of pai gow poker so as to rank lower than the five card high Hand.
 - (4) "Push" shall mean a tie or a stand-off.
 - (5) "Rank or ranking" shall mean the relative position of a card or group of cards among each other.
 - (6) "Second highest or low Hand" shall mean the two card Hand which is formed from the seven cards dealt at the game of pai gow poker so as to rank equal to or lower than the five card high Hand.
 - (7) "Set or setting the Hands" shall mean the process of forming a high Hand and low Hand from the seven cards

dealt.

- (8) "Suit" shall mean one of the four categories of cards, that is, diamond, spade, club or heart.

(b) Equipment .

- (1) Table. Pai gow poker shall be played at a table having on one side places for the players and on the opposite side a place for the Dealer. Each Pai gow poker table shall have a Drop Box and a tip box attached to the Dealer's side of the gaming table, but on opposite sides of the Dealer, as approved in writing by the SGA and the SGO.
- (2) Layout. The Layout for a Pai gow poker table shall be approved in writing by the SGA and the SGO and shall contain, at a minimum:
 - a. The name or logo of the Nation Gaming Operation; and
 - b. Specific areas designated for the placement of wagers, which betting areas shall not exceed seven in number.
- (3) Cards; number of decks
 - a. Except as provided in subparagraph (b) (3) (b) below, pai gow poker shall be played with one standard deck of cards with backs of the same color and design, one additional cutting card and one

additional cover card. The cutting card and cover card shall be opaque and in a solid color readily distinguishable from the color of the backs and edges of the playing cards, as approved in writing by the SGA and the SGO. The deck of cards used to play Pai gow poker shall meet the requirements of Appendix B, Section 69 and shall include one joker.

b. If an automated card shuffling device is used for Pai gow poker, the Nation Gaming Operation shall be permitted to use a second deck of cards to play the game, provided that:

1. Each deck of cards complies with the requirements of subparagraph (b) (3) (a) above;
2. The backs of the cards in the two decks are of a different color;
3. One deck is being Shuffled by the automated card shuffling device while the other deck is being dealt or used to play the game;
4. Both decks are continuously alternated in and out of play, with each deck being used for every other round of play; and
5. The cards from one deck only shall be placed in the discard rack at any given time.

(4) Automated card shuffling device (Optional). An automated card shuffling device is a device which can automatically

perform a Shuffle. Such a device shall meet the requirements of Appendix B, Section 71.

- (5) Discard rack. In order to collect the cards at the conclusion of a round of play and at such other times as provided in the Compact of its Appendices, each Pai gow poker table shall have a discard rack constructed of transparent colored plastic securely attached to the top of the Dealer's side of the table. The height of each discard rack shall equal the height of the cards, stacked one on top of the other, contained in the deck to be used at that table, provided, however, that a taller discard rack may be used if such rack has a distinct and clearly visible mark on its side to show the exact height for one deck of cards.

(c) Pai gow poker rankings; cards; poker Hands

- (1) The rank of the cards used in Pai gow poker, in order of highest to lowest rank, shall be: Ace, King, Queen, Jack, 10, 9, 8, 7, 6, 5, 4, 3, and 2. Notwithstanding the foregoing, an Ace may be used to complete a "straight flush" or a "straight" formed with a 2, 3, 4 and 5. Except as otherwise provided in paragraph (c) (3) below, the Joker shall be used and ranked as an Ace.
- (2) The permissible poker Hands at the game of Pai gow poker, in order of highest to lowest rank, shall be:
 - a. "Five aces" is a high Hand consisting of four Aces and a Joker;

- b. "Royal flush" is a high Hand consisting of an Ace, King, Queen, Jack and 10 of the same suit;
- c. "Straight flush" is a high Hand consisting of five cards of the same suit in consecutive ranking, with Ace, 2, 3, 4, and 5 being the highest ranking straight flush; King, Queen, Jack, 10, and 9 being the second highest ranking straight flush, and 6, 5, 4, 3 and 2 being the lowest ranking straight flush;
- d. "Four-of-a-kind" is a high Hand consisting of four cards of the same rank regardless of suit, with four Aces being the highest ranking four-of-a-kind and four 2s being the lowest ranking four-of-a-kind;
- e. "Full house" is a high Hand consisting of a "three-of-a-kind" and a "Pair," with three Aces and two Kings being the highest ranking full house and three 2s and two 3s being the lowest ranking full house;
- f. "Flush" is a high Hand consisting of five cards of the same suit. When comparing two flushes the provisions of paragraph (c) (5) below shall be applied;
- g. "Straight" is a high Hand consisting of five cards of consecutive rank, regardless of suit, with an Ace, King, Queen, Jack and 10 being the highest ranking straight; an Ace, 2, 3, 4 and 5 being the

second highest ranking straight, and a 6, 5, 4, 3 and 2 being the lowest ranking straight;

- h. "Three-of-a-kind" is a high Hand containing three cards of the same rank regardless of suit, with three Aces being the highest ranking three-of-a-kind and three 2s being the lowest ranking three-of-a-kind;
- i. "Two Pairs" is a high Hand containing two "pairs," with two Aces and two Kings being the highest ranking two Pair Hand and two 3s and two 2s being the lowest ranking two Pair Hand; and
- j. "Pair" is either a high Hand or a low Hand consisting of two cards of the same rank, regardless of suit, with two Aces being the highest ranking pair and two 2s being the lowest ranking pair.

(3) For purposes of setting the Hands, a Joker may be used as any card to complete a "straight," a "flush," a "straight flush" or a "royal flush."

(4) Notwithstanding the provisions of paragraph (c) (2) above, the Nation Gaming Operation may, in its discretion, determine that a straight flush formed with an Ace, 2, 3, 4 and 5 of the same suit shall be the lowest ranking straight flush and that a straight formed with an Ace, 2, 3, 4 and 5, regardless of suit, shall be the lowest ranking straight. If the Nation Gaming Operation chooses to exercise this option, it shall so indicate in writing

to the SGA and the SGO prior to the introduction of such option into any Pai gow poker play.

(5) When comparing two high Hands or two low Hands which are of identical poker Hand rank pursuant to the provisions of this subdivision, or which contain none of the poker Hands authorized herein, the Hand which contains the highest ranking card as provided in paragraph (c) (1) above which is not contained in the other Hand shall be considered the higher ranking Hand. If the two Hands are of identical rank after the application of this subsection, the Hands shall be considered a copy Hand.

(d) Pai gow poker shaker and dice. Pai gow poker shall be played with three dice which shall be maintained at all times inside a Pai gow poker shaker. The dice used to play Pai gow poker shall meet the requirements of Appendix B, Section 66 and the Pai gow poker shaker shall meet the requirements of Appendix B, Section 79.

(1) The Pai gow poker shaker and the dice contained therein shall be the responsibility of the Dealer and shall never be left unattended while at the table.

(2) No dice that have been placed in a Pai gow poker shaker for use in gaming shall remain on a table for more than 24 hours.

(e) Opening of the table for gaming

(1) After receiving a deck of cards at the table, the Dealer shall sort and inspect the cards and the floorperson

assigned to the table shall visually verify the inspection. If the deck of cards used by the Nation Gaming Operation contains two Jokers, the Dealer and a Gaming Facility Supervisor shall ensure that only one Joker is utilized and that the other Joker is torn in half and discarded.

- (2) Following the inspection of the cards by the Dealer and the verification by the floorperson assigned to the table, the cards shall be spread out face up on the table for visual inspection by the first player to arrive at the table. The cards shall be spread out according to suit and in sequence and shall include one Joker.
- (3) After the first player is afforded an opportunity to visually inspect the cards, the cards shall be turned face down on the table, mixed thoroughly by a "Washing" of the cards and stacked. Once the cards have been stacked, they shall be Shuffled.
- (4) If the Nation Gaming Operation uses an automated card shuffling device to play the game of Pai gow poker and two decks of cards are received at the table, each deck of cards shall be separately sorted, inspected, verified, spread, inspected, mixed, stacked and Shuffled in accordance with the provisions of paragraphs (e) (1) through (e) (3) above immediately prior to the commencement of play.
- (5) All cards opened for use on a Pai gow poker table and dealt from a manual or an automated dealing shoe shall be changed at least every eight hours. All cards opened for

use on a Pai gow poker table and dealt from the nar.d shall be changed at least every four hours. Procedures for compliance with this paragraph must be submitted to the SGA for written approval.

(f) Shuffle and cut of the cards

- (1) Immediately prior to the commencement of play and after each round of play has been completed, the Dealer shall Shuffle the cards either manually or by use of an automated card shuffling device so that the cards are randomly intermixed. Upon completion of the Shuffle, the Dealer or device shall place the deck of cards in a single stack; provided, however, that nothing in this section shall be deemed to prohibit an automated card shuffling device which, upon completion of the shuffling of the cards, inserts the cards directly into an automated or manual dealing shoe.
- (2) After the cards have been Shuffled and stacked, the Dealer shall:
 - a. If the cards were Shuffled using an automated card shuffling device, deal or deliver the cards; or
 - b. If the cards were Shuffled manually, cut the cards in accordance with the procedures set forth in paragraphs (f) (3) through (f) (5) below.
- (3) Upon completion of a manual Shuffle, the Dealer shall place the stack of cards on top of the cover card. Thereafter, the Dealer shall offer the stack of cards to

be cut, with the backs facing up and faces facing the Layout, to the player determined pursuant to paragraph (f) (4) below. If no player accepts the cut, the Dealer shall cut the cards.

- (4) The cut of the cards shall be offered to players in the following order:
 - a. The first player to the table, if the game is just beginning;
 - b. The player at the farthest position to the right of the Dealer; provided, the offer to cut the cards shall rotate in a counterclockwise manner after the player to the far right of the Dealer has been offered the cut.
- (5) The player or Dealer making the cut shall place the cutting card in the stack at least 10 cards from either end. Once the cutting card has been inserted, the Dealer shall take the cutting card and all the cards on top of the cutting card and place them on the bottom of the stack. The Dealer shall then remove the cover card and place it on the bottom of the stack. Thereafter, the Dealer shall remove the cutting card and, at the discretion of the Nation Gaming Operation, either place it in the discard rack or use it as an additional cutting card to be inserted four cards from the bottom of the deck. The Dealer shall then deal or deliver the cards.
- (6) After the cards have been cut but before any cards have been dealt, a Gaming Facility Supervisor may require the

cards to be recut if he or she determines that the cut was performed improperly or in any way that might affect the integrity or fairness of the game. If a recut is required, the cards shall be recut, at the Nation Gaming Operation's option, by the player who last cut the cards, or by the next person entitled to cut the cards, as determined by paragraphs (f) (3) and (f) (4) above.

- (7) Whenever there is no gaming activity at a Pai gow poker table which is open for gaming, the cards shall be spread out on the table either face up or face down. If the cards are spread face down, they shall be turned face up once a player arrives at the table. After the first player is afforded an opportunity to visually inspect the cards, the procedures outlined in paragraph (e) (3) above shall be completed.

(g) Wagers

- (1) All wagers at Pai gow poker shall be made by placing gaming chips and, if applicable, a Match Play Coupon on the appropriate betting area of the Pai gow poker Layout.
- (2) Only players who are seated at the Pai gow poker table may place a wager at the game. Once a player has placed a wager and received cards, that player must remain seated until the completion of the round of play.
- (3) All wagers at Pai gow poker shall be placed prior to the Dealer announcing "No more bets." No wager at Pai gow poker shall be made, increased or withdrawn after the Dealer has announced "No more bets."

(h) Procedures for dealing Pai Gow Poker

(1) Procedures for dealing the cards from a manual dealing shoe

- a. If the Nation Gaming Operation chooses to have the cards dealt from a manual dealing shoe, the dealing shoe shall meet the requirements of Appendix B, Section 71. Once the procedures required by subdivision (f) above have been completed, the cards shall be placed in the manual dealing shoe and the Dealer shall announce "No more bets."
- b. The Dealer shall then determine the starting position for dealing the cards pursuant to the procedures contained in subdivision (i) below.
- c. After the starting position for dealing the cards has been determined, each card shall be removed from the dealing shoe with the left hand of the Dealer and placed face down on the appropriate area of the Layout with the right hand of the Dealer. The Dealer shall deal the first card to the starting position as determined in subparagraph (b) above and, moving clockwise around the table, deal a card to all other positions, including the Dealer, regardless of whether there is a wager at the position. The Dealer shall then return to the starting position and deal a second card in a clockwise rotation and shall continue dealing until each position, including the Dealer, has seven cards.

- d. After seven cards have been dealt to each position, including the Dealer, the Dealer shall remove the remaining cards from the shoe and determine whether exactly four cards are left.
 1. If four cards remain, the four cards shall not be exposed to anyone and shall be placed in the discard rack. The Dealer shall then collect any cards dealt to a position where there is no wager and place the cards in the discard rack without exposing them.
 2. If more or less than four cards remain, the Dealer shall determine if the cards were misdealt. If the cards were misdealt and a player or the Dealer has more or less than seven cards, all Hands shall be void. If the cards have not been misdealt, all Hands shall be considered void and the entire deck of cards shall be removed from the table.

(2) Procedures for dealing the cards from the Hand

- a. Notwithstanding any other provision of this section, the Nation Gaming Operation may, in its discretion, permit a Dealer to deal the cards used to play Pai gow poker from his or her Hand.
- b. If the Nation Gaming Operation chooses to have the cards dealt from the Dealer's Hand, the following requirements shall be observed.

1. Once the procedures required by subdivision (f) above have been completed, the Dealer shall place the deck of cards in either hand.
 - A. Once the Dealer has chosen the hand in which he or she will hold the cards, the Dealer shall use that hand whenever holding the cards during that round of play.
 - B. The cards held by the Dealer shall at all times be kept in front of the Dealer and over the table inventory container.
2. The Dealer shall then announce "No more bets" prior to dealing seven stacks of seven cards each to the area in front of the table inventory container. The Dealer shall deal each card by holding the deck of cards in the chosen hand and using the other hand to remove the top card of the deck and place it face down on the appropriate area of the Layout.
 - c. The Dealer shall deal the first seven cards moving from left to right and the second seven cards moving from right to left and shall continue alternating in this manner until there are seven stacks of seven cards.
 - d. After seven stacks of seven cards have been dealt, the Dealer shall determine whether exactly four cards are left by spreading them face down on the

Layout.

1. If four cards remain, the cards shall not be exposed to anyone at the table and shall be placed in the discard rack.
2. If more or less than four cards remain, the Dealer shall determine if the cards were misdealt. If the cards were misdealt and a stack has more or less than seven cards, the round of play shall be void and the cards reshuffled. If the cards have not been misdealt, the round of play shall be considered void and the entire deck of cards shall be removed from the table.

(3) Procedures for dealing the cards from an automated dealing shoe

- a. Notwithstanding any other provision of this section, the Nation Gaming Operation may, in its discretion, choose to have the cards used to play Pai gow poker dealt from an automated dealing shoe which dispenses cards in stacks of seven cards, provided that the shoe, its location and the procedures for its use are approved in writing by the SGA and the SGO.
- b. If the Nation Gaming Operation chooses to have the cards dealt from an automated dealing shoe, the following requirements shall be observed.

1. Once the procedures required by subdivision (e) have been completed, the cards shall be placed in the automated dealing shoe.
 - (2) The Dealer shall then announce "No more bets" prior to the shoe dispensing any stacks of cards.
- c. The Dealer shall then determine the starting position for dealing the cards pursuant to the procedures contained in subdivision (i) below.
- d. Once the starting position has been determined in accordance with subparagraph (h) (3)(c) above, the Dealer shall deliver the first stack of cards dispensed by the automated dealing shoe to that position. As the remaining stacks are dispensed to the Dealer by the automated dealing shoe, the Dealer shall deliver a stack in turn to each of the other positions, including the Dealer, moving clockwise around the table, whether or not there is a wager at the position. The Dealer shall deliver each stack face down.
- e. After the seven stacks of seven cards have been dispensed and delivered to each position, including the Dealer, the Dealer shall remove the remaining cards from the shoe and determine whether exactly four cards are left by spreading them face down on the Layout.
1. If four cards remain, the cards shall not be

exposed to anyone at the table and shall be placed in the discard rack.

2 If more or less than four cards remain, the Dealer shall determine if the cards were misdealt. If the cards were misdealt and a stack has more or less than seven cards, the round of play shall be void and the cards reshuffled. If the cards have not been misdealt, the round of play shall be considered void and the entire deck of cards shall be removed from the table.

f. If the Dealer determines the cards were dealt properly, the Dealer shall then collect any stacks dealt to a position where there is no wager and place them in the discard rack without exposing the cards.

(i) Procedure for determining the starting position for dealing cards or delivering stacks of cards

(1) In order to determine the starting position for the dealing of cards or the delivery of stacks of cards for the game of Pai gow poker, the Nation Gaming Operation may, in its discretion, use the procedure authorized in paragraphs (i) (2) or (i) (3) below.

(2) The Dealer shall shake the Pai gow poker shaker and dice at least three times so as to cause a random mixture of the dice.

- a. The Dealer shall then remove the lid covering the Pai gow poker shaker, total the dice and announce the total.
 - b. To determine the starting position, the Dealer shall count counterclockwise around the table, with the position of the Dealer considered number one, and continuing around the table with each betting position counted in order, including the Dealer, regardless of whether there is a wager at the position, until the count matches the total of the three dice.
 - c. Examples are as follows:
 - 1. If the dice total 8, the Dealer would receive the first card or stack of cards; or
 - 2. If the dice total 14, the sixth betting position would receive the first card or stack of cards.
 - ci. After the dealing or delivery of the cards has been completed the Dealer shall place the cover on the Pai gow poker shaker and shake the shaker once. The Pai gow poker shaker shall then be placed to the right of the Dealer.
- (3) After the starting position for a round of play has been determined, the Nation Gaming Operation may, in its discretion, mark that position by the use of an additional cut card or similar object.

- (j) Procedures for completion of each round of play; setting of Hands; payment and collection of wagers; Payout odds; Vigorish
- (1) After the dealing of the cards has been completed, each player shall set his or her Hands by arranging the cards into a high Hand and low Hand. When setting the two Hands, the five card high Hand must be equal to or higher in rank than the two card low Hand. For example, if the two card Hand contains a Pair of sevens, the five card Hand must contain at least a Pair of sevens and the three remaining cards.
 - (2) Each player at the table shall be responsible for setting his or her own Hands and no other person except the Dealer may touch the cards of that player. Each player shall be required to keep the seven cards in full view of the Dealer at all times. Once each player has set a high and low Hand and placed the two Hands face down on the appropriate area of the Layout, the player shall not touch the cards again.
 - (3) After all players have set their Hands and placed the cards on the table, the seven cards of the Dealer shall be turned over and the Dealer shall set his or her Hands by arranging the cards into a high and low Hand. The Dealer shall then place the two Hands face up on the appropriate area of the Layout.
 - (4) The Nation Gaming Operation shall submit to the SGA for written approval the manner in which it will require the Hands of the Dealer to be set.

- (5) A player may announce that he or she wishes to surrender his or her wager prior to the Dealer exposing either of the two Hands of that player pursuant to paragraph (j) (6) below. Once the player has announced his or her intention to surrender, the Dealer shall:
- a. Immediately collect the wager from that player; and
 - b. Collect the seven cards dealt to that player without exposing the cards to anyone at the table. The Dealer shall verify that seven cards were collected by counting them face down on the Layout prior to placing them in the discard rack.
- (6) Once the Dealer has set a high and low Hand, the Dealer shall expose both Hands of each player, starting from the right and proceeding counterclockwise around the table. The Dealer shall compare the high and low Hand of each player to the high and low Hand of the Dealer and shall announce if the wager of that player shall win, lose or be considered a "push."
- (7) All losing wagers shall be immediately collected by the Dealer and put in the table inventory container. All losing Hands shall also be collected. A wager made by a player shall lose if:
- a. The high Hand of the player is lower in rank than the high Hand of the Dealer and the low Hand of the player is lower in rank than the low Hand of the Dealer;

- b. The high Hand of the player is identical in rank to the high Hand of the Dealer or the low Hand of the player is identical in rank to the low Hand of the Dealer (a "copy Hand") and the other Hand of the player is identical in rank or lower in rank than the other Hand of the Dealer;
 - c. The high Hand of the player was not set so as to rank equal to or higher than the low Hand of that player; or
 - d. The two Hands of the player were not otherwise set correctly in accordance with the rules of the game (for example, a player forms a three card low Hand and a four card high Hand).
- (8) If a wager is a push, the Dealer shall not collect or pay the wager, but shall immediately collect the cards of that player. A wager made by a player shall be a push if:
- a. The high Hand of the player is higher in rank than the high Hand of the Dealer, but the low Hand of the player is identical in rank to the low Hand of the Dealer (copy Hand) or lower in rank than the low Hand of the Dealer; or
 - b. The high Hand of the player is identical in rank to the high Hand of the Dealer (copy Hand) or lower in rank than the high Hand of the Dealer, but the low Hand of the player is higher in rank than the low Hand of the Dealer.

- (9) All winning Hands shall remain face up on the Layout. Winning wagers shall be paid after all Hands have been exposed. The Dealer shall pay winning wagers beginning with the player farthest to the right of the Dealer and continuing counterclockwise around the table. A wager made by a player shall win if the high Hand of the player is higher in rank than the high Hand of the Dealer and the low Hand of the player is higher in rank than the low Hand of the Dealer.
- (10) A winning Pai gow poker wager shall be paid by the Nation Gaming Operation at odds of 1 to 1, except that the Nation Gaming Operation shall extract a Vigorish from the winning player in an amount equal to five percent of the amount won; provided, however, that when collecting the Vigorish, the Nation Gaming Operation may round off the Vigorish to 25 cents or the next highest multiple of 25 cents. The Nation Gaming Operation shall collect the Vigorish from a player at the time the winning Payout is made. After a winning wager has been paid and the Vigorish collected, the Dealer shall then collect the cards from that player.
- (11) All cards collected by the Dealer shall be picked up in order and placed in the discard rack in such a way that they can be readily arranged to reconstruct each Hand in case of a question or dispute.
- (k) Irregularities; invalid roll of the dice
- (1) If the Dealer uncovers the Pai gow poker shaker and all three dice do not land flat on the bottom of the shaker,

the Dealer shall call a "No Roll" and reshake the dice.

- (2) If the Dealer uncovers the Pai gow poker shaker and a die or dice fall out of the shaker, the Dealer shall call a "No Roll" and reshake the dice.
- (3) If the Dealer incorrectly totals the dice and deals the first card or delivers the first stack to the wrong position, all Hands shall be called dead and the Dealer shall reshuffle the cards.
- (4) If the Dealer exposes any of the cards dealt to a player, the player has the option of voiding the Hand. Without looking at the unexposed cards, the player shall make the decision either to play out the Hand or to void the Hand.
- (5) If a card or cards in the Hand of the Dealer is exposed, all Hands shall be void and the cards shall be reshuffled.
- (6) A card found turned face up in the shoe shall not be used in the game and shall be placed in the discard rack. If more than one card is found turned face up in the shoe, all Hands shall be void and the cards shall be reshuffled.
- (7) A card drawn in error without its face being exposed shall be used as though it was the next card from the shoe.
- (8) If any player or the Dealer is dealt an incorrect number of cards, all Hands shall be void and the cards

reshuffled.

- (9) If the Dealer does not set his or her Hands in the manner required by this section, the Hands must be reset in accordance with this submission and the round of play completed.
 - (10) If a card is exposed while the Dealer is dealing the seven stacks, the cards shall be reshuffled.
 - (11) If an automated dealing shoe is being used and the device jams, stops dealing cards, or fails to deal all cards during a round of play, the round of play shall be void, and the cards shall be removed from the device and reshuffled with any cards already dealt, in accordance with procedures approved in writing by the SGA.
 - (12) My automated card shuffling device or automated dealing shoe shall be removed from a gaming table before any other method of shuffling or dealing may be utilized at that table.
- (1) Minimum wagers and maximum wagers

The Nation Gaming Operation shall determine the minimum and maximum wagers at each table. The amounts of the minimum and maximum wagers shall be conspicuously posted on a sign at each table.

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- g. "Marker" shall mean an object or objects used to designate the bank and the co-bank, as approved by the SGA in writing.
- h. "Matched pairs" is defined in (c) below.
- i. "Mixed or unmatched pairs" is defined in (c) below.
- j. "Push" is a tie as defined in (h) (8) below.
- k. "Rank or ranking" shall mean the relative position of a pai gow Hand as set forth in (c) below.
- l. "Second highest or low Hand" shall mean the two tile Hand formed with two of the four tiles dealt at the game of pai gow so as to rank lower than the Hand formed from the remaining two tiles.
- m. "Setting the Hands" shall mean the process of forming a high Hand and a low Hand from the four dealt tiles.
- n. "Supreme pair" shall mean the pair of tiles that form the highest ranking Hand in the game of pai gow and shall be formed with the six (2-4) tile and the three (1-2) tile.
- o. "Value" shall mean the numerical point value assigned to a pair of tiles in accordance with the provisions of (c) below.
- p. "Washing" is defined in (e) below.

q. "Wongs" is defined in (c) below.

(b) Equipment.

- (1) Table. Pai gow tiles shall be played at a table having on one side places for the players and on the opposite side a place for the Dealer. Each Pai gow tiles table shall have a Drop Box and a tip box attached to the Dealer's side of the gaming table, but on opposite sides of the Dealer, as approved in writing by the SGA and the SGO.
- (2) Layout. The Layout for a Pai gow tiles table shall be approved in writing by the SGA and the SGO and shall contain, at a minimum:
 - a. The name or logo of the Nation Gaming Operation; and
 - b. Specific areas designated for the placement of wagers, which betting areas shall not exceed seven in number.

(c) Pai gow tiles physical characteristics

- (1) Pai gow shall be played with a set of 32 rectangular blocks to be known as tiles. Each tile in a set shall be identical in size and shading to every other tile in the set.
- (2) Each tile used in gaming at pai gow shall:

- a. Be made of a non-transparent black material, formed in the shape of a rectangle, and be of a size no smaller than 2.500 inches in length, 1.000 inch in width and .375 of an inch in thickness;
 - b. Have the surface of each of its sides perfectly flat, except that the front side of each tile shall contain spots which shall extend into the tile exactly the same distance as every other spot;
 - c. Have on the back of each tile an identifying feature unique to each casino;
 - d. Have the texture and finish of each side, with the exception of the front side, exactly identical to the texture and finish of all other sides;
 - e. Have the back and sides of each tile within a set be identical and no tile within a set shall contain any marking, symbol or design that will enable a person to know the identity of any element on the front side of the tile or that will distinguish any tile from any other tile within a set; and
 - f. Have identifying spots on the front of the tiles which are either red or white or both.
- (3) Each set of tiles shall be composed of 32 tiles as set forth in (c).
- (4) Each set of tiles shall be packaged separately and

completely sealed in such a manner so that any tampering shall be evident.

(d) Pai gow tiles; ranking of Hands, pairs and tiles; value of the Hand

(1) Pai gow shall be played with one set of 32 tiles which shall meet the requirements of (b) above.

(2) When comparing high Hands or low Hands to determine the higher ranking Hand, the determination shall first be based upon the rank of any permissible pair of tiles which are contained in the Hands. A Hand with any permissible pair of tiles shall rank higher than a Hand which does not contain any permissible pair. The permissible pairs of tiles in pai gow and their rank, with the "supreme pair" being the highest or "first" ranking pair, are as follows:

Ranking

Pairing

Supreme Pair

First

Six (2-4) and Three (1-2)

Matched Pairs

Second

Twelve (6-6) and Twelve (6-6)

Third

Two (1-1) and Two (1-1)

Fourth

Eight (4-4) and Eight (4-4)

Fifth

Four (1-3) and Four (1-3)

Sixth

Ten (5-5) and Ten (5-5)

Seventh	Six (3-3) and Six (3-3)
Eighth	Four (2-2) and Four (2-2)
Ninth	Eleven (5-6) and Eleven (5-6)
Tenth	Ten (4-6) and Ten (4-6)
Eleventh	Seven (1-6) and Seven (1-6)
Twelfth	Six (1-5) and Six (1-5)

Mixed or Unmatched Pairs

Thirteenth	Mixed Nines (3-6 and 4-5)
Fourteenth	Mixed Eights (3-5 and 2-6)
Fifteenth	Mixed Sevens (3-4 and 2-5)
Sixteenth	Mixed Fives (1-4 and 2-3)

Wongs

Seventeenth	Twelve (6-6) and Nine (4-5) Twelve (6-6) and Nine (3-6j)
Eighteenth	Two (1-1) and Nine (4-5) Two (1-1) and Nine (3-6)

Gongs

Nineteenth	Twelve (6-6) and Eight (2-6) Twelve (6-6) and Eight (3-5) Twelve (6-6) and Eight (4-4) Two (1-1) and Eight (2-6)
Twentieth	Two (1-1) and Eight (3-5) Two (1-1) and Eight (4-4)

(3) When comparing high Hands or low Hands which are of identical permissible pair rank, the Dealer or, if

applicable, the bank shall win that Hand (copy Hand).

- (4) When comparing the rank of high Hands or low Hands which do not contain any of the pairs listed in (2) above, the higher ranking Hand shall be determined on the basis of the "value" of the Hands. The value of a Hand shall be a single digit number from zero to nine inclusive and shall be determined by adding the total number of spots which are contained on the two tiles which form the Hand. If the numeric total of the spots is a two digit number, the left digit of such number shall be discarded and the right digit shall constitute the value of the Hand. Examples of this rule are as follows:

- a. A Hand composed of a two (1-1) and a six (3-3) has a value of eight; and
- b. A Hand composed of an eleven (5-6) and a seven (1-6) has a numeric total of 18, but a value of only eight, since the left digit ("1") in the number 18 is discarded.

- (5) Notwithstanding the provisions of (4) above, if the tiles which form the supreme pair are used separately, the numeric total of the three (1-2) may be counted as a six and the numeric total of the six (2-4) may be counted as a three. When the three (1-2) is counted as six, its individual ranking pursuant to (7) below shall be fifteenth instead of seventeenth and when the six (2-4) is counted as three its individual ranking shall be seventeenth instead of fifteenth.

(6) When comparing high Hands or low Hands which are of identical value, the Hand with the highest ranking individual tile shall be considered the higher ranking Hand.

(7) The individual ranking for each tile, with "first" representing the highest ranking, is as follows:

Ranking	Tile	Number of Tiles in Set
First	Twelve (6-6)	2
Second	Two (1-1)	2
Third	Eight (4-4)	2
Fourth	Four (1-3)	2
Fifth	Ten (5-5)	2
Sixth	Six (3-3)	2
Seventh	Four (2-2)	2
Eighth	Eleven (5-6)	2
Ninth	Ten (4-6)	2
Tenth	Seven (1-6)	2
Eleventh	Six (1-5)	2
Twelfth	Nine (3-6)	1
Thirteenth	Nine (4-5)	1
Fourteenth	Eight (2-6)	1
Fifteenth	Eight (3-5)	1
Sixteenth	Seven (2-5)	1
Seventeenth	Seven (3-4)	1
	Six (2-4)	1
	Five (1-4)	1
	Five (2-3)	1
	Three (1-2)	1

- (8) If the highest ranking tile in each Hand being compared is of identical rank after the application of (6) above, the Hand shall be considered a copy Hand, and the Hand of the Dealer or bank, as applicable, shall be considered the high ranking Hand.
- (e) Dice; number or dice; pai gow shaker
 - (1) Pai gow shall be played with three dice which shall be maintained at all times inside a pai gow shaker while at the table. The dice used to play pai gow shall meet the requirements of Appendix B, Section 66. The pai gow shaker shall meet the requirements of Appendix B, Section 79.
 - (2) The pai gow shaker and the dice contained therein shall be the responsibility of the Dealer and shall never be left unattended while at the table.
 - (3) No dice that have been placed in a pai gow shaker for use in gaming shall remain on a table for more than 24 hours.
 - (f) Opening of the table for gaming; shuffling procedures
 - (1) After receiving one set of tiles at the table, the Dealer shall sort and inspect the tiles and the floorperson assigned to the table shall verify the inspection. Nothing in this section shall preclude the Nation Gaming Operation from cleaning the tiles prior to the inspection required herein. The inspection of tiles at the gaming table shall require the following:

- a. Each set shall be sorted into pairs in order to assure that the supreme pair and all 15 matched and unmatched pairs as identified in (c) (2) above are in the set.
 - b. Each tile shall be placed side by side in order to determine that all tiles are the same size and shading.
 - c. The back and sides of each tile shall be examined to assure that it is not flawed, scratched or marked in any way.
 - i. If, after checking the tiles, the Dealer finds that certain tiles are unsuitable for use, a Gaming Facility Supervisor shall bring a substitute set of tiles to the table from the reserve in the Pit stand.
 - ii. The unsuitable set of tiles shall be placed in a sealed envelope or container, identified by table number, date and time and shall be signed by the Dealer and Gaming Facility Supervisor.
- (2) Following the inspection of the tiles and the verification by the floorperson assigned to the table, the tiles shall be turned face up, then placed into 16 pairs and arranged according to rank starting with the supreme pair. The tiles shall be left in pairs for visual inspection by the first player to arrive at the table.

- (3) After the first player is afforded an opportunity to visually inspect the tiles, the tiles shall be turned face downward on the table, mixed thoroughly by a "Washing" of the tiles and stacked.
- (4) The "Washing" of the tiles shall be performed by the Dealer and be known as the Shuffle and shall be performed with the heels of the palms of the hands. The Dealer shall Shuffle the tiles in a circular motion with one hand moving clockwise and the other hand counterclockwise. Each Hand shall complete at least eight circular motions in order to provide a random Shuffle. The Dealer shall then randomly pick up four tiles with each Hand and place them side by side in stacks in front of the table inventory container, forming eight stacks of four tiles.
- (5) If during the stacking process described in (4) above, a tile is turned over and exposed to the players, the entire set of tiles shall be reshuffled.
- (6) After each round of play has been completed, the Dealer shall turn all of the tiles face down and Shuffle the tiles in accordance with (4) above.
- (7) If there is no gaming activity at the pai gow table, the tiles shall be turned face up and placed into 16 pairs according to rank starting with the supreme pair. Once a player arrives at the table, the procedures in (3) and (4) above shall be followed.

(g) Wagers

- (1) All wagers at pai gow shall be made by placing gaming chips or plaques and, if applicable, a Match Play Coupon on the appropriate betting area of the pai gow Layout. An oral wager accompanied by cash shall not be accepted at the game of pai gow.
- (2) Only players who are seated at the pai gow table may place a wager at the game. Once a player has placed a wager and received tiles, that player must remain seated until the completion of the round of play.
- (3) All wagers at pai gow shall be placed prior to the Dealer announcing "No more bets" in accordance with the dealing procedures set forth in (g) below). No wager at pai gow shall be made, increased or withdrawn after the Dealer has announced "No more bets."

(h) Procedures for dealing the tiles

- (1) Once the Dealer has completed shuffling the tiles, the Dealer shall announce "No more bets" prior to shaking the pai gow shaker. The Dealer shall then shake the pai gow shaker at least three times so as to cause a random mixture of the dice.
- (2) The Dealer shall then remove the lid covering the pai gow shaker, total the dice and announce the total. The total of the dice shall determine which player receives the first stack of tiles.
- (3) To determine the starting position for dealing the tiles, the Dealer shall count counterclockwise around the table,

with the position of the Dealer considered number one and continuing around the table with each betting position, regardless of whether there is a wager at the position, and the dead Hand counted in order until the count matches the total of the three dice. Examples are as follows:

- a. If the dice total nine, the Dealer would receive the first stack of four tiles; or
 - b. If the dice total 15, the sixth wagering position would receive the first stack of four tiles.
- (4) The Dealer shall deal the first stack of four tiles, starting from the right side of the eight stacks, to the starting position as determined in (3) above and, moving counterclockwise around the table, deal all other positions including the dead Hand and the Dealer a stack of tiles, regardless of whether there is a wager at the position. The Dealer shall place a marker on top of his or her stack of tiles immediately after they are dealt.
 - (5) After all the stacks of tiles have been dealt, the Dealer shall, without exposing the tiles, collect any stacks dealt to a position where there is no wager and place the stacks with the dead Hand on the Layout to the left of the Dealer in front of the table inventory container.
 - (6) Once all tiles have been dealt and any tiles dealt to positions with no wagers have been collected, the Dealer shall place the cover on the pai gow shaker and shake the shaker once. The pai gow shaker shall then be placed to

the right of the Dealer.

(i) Procedures for completion of each round of play; setting of Hands; payment and collection of wagers; Payout odds; Vigorish

- (1) After the dealing of the tiles has been completed, each player shall set his or her Hands by arranging the tiles into a high Hand and low Hand. After setting the Hands the tiles shall be placed face down on the Layout immediately behind that player's betting area and separated into two distinct Hands.
- (2) Each player at the table shall be responsible for setting his or her own Hands and no other person except the Dealer may touch the tiles of that player. Notwithstanding the foregoing, if a player requests assistance in the setting of his or her Hands, the Dealer may inform the requesting player of the manner in which the Nation Gaming Operation requires the Hands of the Dealer to be set. Each player shall be required to keep the four tiles in full view of the Dealer at all times. Once each player has set a high Hand and low Hand and placed the two Hands face down on the Layout, the player shall not touch the tiles again.
- (3) After all players have set their Hands and placed the tiles on the table, the four tiles of the Dealer shall be turned over and the Dealer shall set his or her Hands by arranging the tiles in a high and low Hand. The high Hand shall be placed on the Layout face up to his or her right and the low Hand shall be placed on the Layout face up to his or her left. If banking or co-banking is in effect

pursuant to (i) below, after all players have set their Hands and placed the tiles on the table, the player banking the game shall turn over his or her four tiles and shall set the two Hands by arranging the tiles in a high and low Hand on the appropriate area of the Layout.

- (4) Except as provided in (5) below, the Dealer shall be required to comply with the following rules when setting the Hands of the Dealer:
 - a. If the Dealer has the supreme pair, it shall be played as such;
 - b. If possible, the Dealer shall always play a pair, wong or gong as set forth in (c) above;
 - c. If the Dealer does not have any combinations described in (4)a. or (4)b. above, the Dealer shall play any two tiles together which have a value equal to nine, eight or seven; and
 - d. If the Dealer does not have a combination listed in (4)a. through (4)c. above, the Dealer shall play the highest ranking tile with the lowest ranking tile.

- (5) The Nation Gaming Operation shall submit to the SGA for approval in writing the manner in which it proposes to require the Hands of the Dealer to be set, and shall specifically note any exceptions it proposes to the rules listed in (4) above.

- (6) A player may surrender his or her wager after the Hands of the Dealer have been set. The player must announce his or her intention to surrender prior to the Dealer exposing either of the two Hands of that player pursuant to (7) below. Once the player has announced his or her intention to surrender, the Dealer shall:
 - a. Immediately collect the wager from that player; and
 - b. Collect the four tiles dealt to that player and stack them face down on the right side of the table in front of the table inventory container without exposing the tiles to anyone at the table.
- (7) Once the Dealer has set a high and low Hand, the Dealer shall expose both Hands of each player, starting with the player farthest to the right of the Dealer and proceeding counterclockwise around the table. The Dealer shall always compare the high Hand of the player to the high Hand of the Dealer and the low Hand of the player to the low Hand of the Dealer and shall announce if the wager of that player shall win, lose or be considered a tie ("push").
- (8) All losing wagers shall be collected immediately by the Dealer and put in the table inventory container. All losing Hands shall also be collected. A wager made by a player shall lose if the high Hand of the player is identical in rank or lower in rank than the high Hand of the Dealer, and the low Hand of the player is identical in rank or lower in rank than the low Hand of the Dealer

or has a value of zero.

- (9) If a wager is a push, the Dealer shall not collect or pay the wager, but shall immediately collect the tiles of that player. A wager made by a player shall be a push if:
- a. The high Hand of the player is higher in rank than the high Hand of the Dealer, but the low Hand of the player is identical in rank to the low Hand of the Dealer (copy Hand), lower in rank than the low Hand of the Dealer or has a value of zero; or
 - b. The high Hand of the player is identical in rank to the high Hand of the Dealer (copy Hand) or lower in rank than the high Hand of the Dealer, but the low Hand of the player is higher in rank than the low Hand of the Dealer.
- (10) All winning Hands shall remain face up on the Layout. Winning wagers shall be paid after all Hands have been exposed. The Dealer shall pay winning wagers beginning with the player farthest to the right of the Dealer and continuing counterclockwise around the table. A wager made by a player shall win if the high Hand of the player is higher in rank than the high Hand of the Dealer and the low Hand of the player is higher in rank than the low Hand of the Dealer.
- (11) A winning pai gow wager shall be paid off by the Nation Gaming Operation at odds. of 1 to 1, except that the Nation Gaming Operation shall extract a commission known

as "Vigorish" from the winning player in an amount equal to five percent of the amount won; provided, however, that when collecting the Vigorish, the Nation Gaming Operation may round off the Vigorish to 25 cents or the next highest multiple of 25 cents. The Nation Gaming Operation shall collect the Vigorish from a player at the time the winning Payout is made. After a winning wager has been paid and the Vigorish collected, the Dealer shall then collect the tiles from that player.

(12) All tiles collected by the Dealer shall be picked up in order and in such a way that they can be readily arranged to reconstruct each Hand in case of a question or dispute and shall be placed face up to the right of the Dealer in front of the table inventory container.

(j) Player bank; co-banking; selection of bank; procedures for dealing

(1) The Nation Gaming Operation may, in its discretion, offer to all players at a pai gow table the opportunity to bank the game. If the Nation Gaming Operation elects this option, all the other provisions of this subchapter shall apply except to the extent that they conflict with the provisions of this section, in which case the provisions of this section shall control for any round of play in which a player is the bank.

(2) A player may not be the bank at the start of the game. For the purposes of this section, the start of the game shall mean the first round of play after the Dealer is required to restack and Shuffle the tiles in accordance

with the procedures set forth in (e) (2) or (e) (7) above.

- (3) After the first round of play pursuant to (2) above, each player at the table shall have the option to either be the bank or pass the bank to the next player. The Dealer shall, starting with the player farthest to the right of the Dealer, offer the bank to each player in a counterclockwise rotation around the table until a player accepts the bank. The Dealer shall place a marker designating the bank in front of the player who accepts the bank. If the first player offered the bank accepts, the player seated to the right of that player shall first be offered the bank on the next round of play. The initial offer to be the bank shall rotate counterclockwise around the table until it returns to the Dealer. In no event may any player bank two consecutive rounds of play. If no player wishes to be the bank, the round of play shall proceed in accordance with the rules of play provided in this subchapter.

- (4) Before a player may be permitted to bank a round of play, the Dealer shall determine that:
 - a. The player placed a wager against the Dealer during the last round of play in which there was no player banking the game; and
 - b. The player has sufficient gaming chips on the table to cover all of the wagers placed by other players at the table for that round of play.

- (5) The Nation Gaming Operation may, in its discretion, offer

the bank the option of having the casino cover 50 percent of the wagers made during a round of play. If the Nation Gaming Operation offers this option, it shall make it available to all players at the table. If the bank wishes to use this option, the bank must specifically request the Dealer to accept responsibility for the payment of one-half of all winning wagers. When the bank covers 50 percent and the casino covers 50 percent of the winning wagers, it shall be known as "co-banking" and the Dealer shall place a marker designating the co-bank in front of that player. When the Dealer is co-banking, the Dealer shall be responsible for setting the Hand of the bank in the manner submitted to the SGA pursuant to (h) above. When co-banking is in effect, the Dealer may not place a wager against the bank.

- (6) If a player is the bank, the player may only wager on one betting area.
- (7) Once the tiles have been Shuffled and formed into stacks pursuant to (e) (4), the bank shall have the option to cut the tiles one time. If the bank does not wish to cut the tiles, there shall be no cut. Upon direction from the bank, the Dealer may move:
 - a. One or more adjacent stacks of four tiles to the right or left end of the original eight stacks of tiles; or
 - b. Two or more adjacent stacks of four tiles, of which at least one stack is moved to one end and the other stacks are moved to the opposite end of the

original eight stacks of tiles.

- (8) Once the Dealer has determined that a player may be the bank pursuant to (4) above and the tiles have been Shuffled and, if applicable, cut, the Dealer shall, unless co-banking is in effect, remove gaming chips from the table inventory container in an amount equal to the last wager made by that player against the Dealer or in an amount, the calculation of which has been approved by the SGA in writing. This amount shall be the amount the Dealer wagers against the bank. The bank may direct that the sum wagered by the Dealer be a lesser amount or that the Dealer place no wager during that round of play. Any amount wagered by the Dealer shall be placed in front of the table inventory container. Immediately upon receipt of the four tiles dealt to the Dealer pursuant to (11) below, the Dealer shall place his or her wager on top of these tiles, instead of the marker otherwise required by (g), before dealing the remaining tiles. If co-banking is in effect, the Dealer shall not remove any gaming chips from the table inventory container pursuant to this subsection.
- (9) Once the Dealer has announced "No more bets," the bank may, by issuing an oral instruction to the Dealer, choose to have the Dealer deliver the stacks of tiles using any one of the 10 styles of delivery described in (11) below. If the bank does not choose a style of delivery, the Dealer shall use house way from the right. After the style of delivery has been determined, the Dealer shall indicate in order the style of delivery to be used by verbally repeating the selected style of delivery, taking

such other action, approved by the SGA in writing, that identifies the selected delivery style to the surveillance department, and moving certain stacks of tiles or individual tiles slightly forward, backward or diagonally in the manner described in (11) a. through j. below. After the Dealer has indicated the style of delivery, the bank shall shake the pai gow shaker. It shall be the responsibility of the Dealer to ensure that the bank shakes the pai gow shaker at least three times so as to cause a random mixture of the dice. Once the bank has completed shaking the pai gow shaker, the Dealer shall remove the lid covering the pai gow shaker, total the dice and announce the total. The Dealer shall always remove the lid from the pai gow shaker and if the bank inadvertently removes the lid, the Dealer shall require the pai gow shaker to be covered and reshaken by the bank.

- (10) To determine the starting position for dealing the tiles, the Dealer shall count counterclockwise around the table, with the position of the bank considered number one and continuing around the table with each betting position, including the Dealer, regardless of whether there is a wager at the position, and the dead Hand counted in order until the count matches the total of the three dice.
- (11) The Dealer shall deal the first four tiles, in accordance with the selected style of delivery described in (11) a. through j. below, to the starting position as determined in (10) above and, moving counterclockwise around the table, deal all other positions including the dead Hand and the Dealer four tiles, regardless of whether there is

a wager at the position. The Dealer shall place his or her wager or marker, as applicable, on top of his or her stack of tiles immediately after they are dealt. The Nation Gaming Operation shall set forth the delivery styles offered to the bank. The 10 styles of delivery that may be used to deal the pai gow tiles are as follows:

- a. House way from the right: The Dealer shall indicate the use of house way from the right by pushing forward the first stack of tiles on the Dealer's right. The Dealer shall deliver the stack pushed forward to the starting position. The remaining stacks of tiles shall be delivered from the Dealer's right to left.
- b. House way from the left: The Dealer shall indicate the use of house way from the left by pushing forward the first stack of tiles on the Dealer's left. The Dealer shall deliver the stack pushed forward to the starting position. The remaining stacks of tiles shall be delivered from the Dealer's left to right.
- c. Cup say (pick four) from the right: The Dealer shall indicate the use of cup say from the right by pushing forward the first two stacks of tiles on the Dealer's right. The Dealer shall deliver the top two tiles from each of the two stacks pushed forward to the starting position. The four remaining tiles pushed forward shall be delivered to the next position. The remaining stacks of

tiles shall be delivered from the Dealer's right to left in the same manner as the first two stacks.

- d. Cup say (pick four) from the left: The Dealer shall indicate the use of cup say from the left by pushing forward the first two stacks of tiles on the Dealer's left. The Dealer shall deliver the top two tiles from each of the two stacks pushed forward to the starting position. The four remaining tiles pushed forward shall be delivered to the next position. The remaining stacks of tiles shall be delivered from the Dealer's left to right in the same manner as the first two stacks.

- e. Jung quat (take the heart) : The Dealer shall indicate the use of jung quat by pushing forward the fourth stack of tiles from the Dealer's right and the fourth stack of tiles from the Dealer's left (the two center stacks of the eight) . The Dealer shall deliver the top two tiles from each of the two stacks pushed forward to the starting position. The four remaining tiles pushed forward shall be delivered to the next position. The remaining stacks shall be pushed together and the two new center stacks shall be pushed forward and delivered in the same manner as the first two stacks. This procedure shall be repeated until all eight stacks of tiles have been delivered.

- f. Chee yee (chop the ears): The Dealer shall indicate the use of chee yee by pushing forward the first stack of tiles on the Dealer's right and the

first stack of tiles on the Dealer's left. To deliver the tiles, the Dealer shall center the two stacks pushed forward in front of the remaining stacks. The Dealer shall deliver the top two tiles from each of the two centered stacks to the starting position. The four remaining tiles from the two centered stacks shall be delivered to the next position. The Dealer shall then center and deliver the first stack remaining on the Dealer's right and the first stack remaining on the Dealer's left in the same manner. This procedure shall be repeated until all eight stacks of tiles have been delivered.

g. Pin say (slice four) from the right: The Dealer shall indicate the use of pin say from the right by removing the top tile of the first stack of tiles on the Dealer's right and placing it diagonally across the top of the second, third and fourth stacks of tiles from the Dealer's right. The Dealer shall deliver the top tile from each of the first four stacks on the Dealer's right to the starting position (the diagonal tile plus the three tiles it covers). The top tile from each of the first four stacks on the Dealer's left shall be delivered to the next position. The top tile remaining on each of the first four stacks on the Dealer's right shall be delivered to the third position and the top tile remaining on each of the first four stacks on the Dealer's left shall be delivered to the fourth position. This procedure shall be repeated until four tiles have been

delivered to all eight positions.

- h. Pin say (slice four) from the left: The Dealer shall indicate the use of pin say from the left by removing the top tile of the first stack of tiles on the Dealer's left and placing it diagonally across the top of the second, third and fourth stacks of tiles from the Dealer's left. The Dealer shall deliver the top tile from each of the first four stacks on the Dealer's left to the starting position (the diagonal tile plus the three tiles it covers). The top tile from each of the first four stacks on the Dealer's right shall be delivered to the next position. The top tile remaining on each of the first four stacks on the Dealer's left shall be delivered to the third position and the top tile remaining on each of the first four stacks on the Dealer's right shall be delivered to the fourth position. This procedure shall be repeated until four tiles have been delivered to all eight positions.

- i. Dragon head and phoenix tail from the right: The Dealer shall indicate the use of dragon head and phoenix tail from the right by placing all four tiles in the first and second stacks from the Dealer's right directly on top of the four tiles in third and fourth stacks from the Dealer's right and then pushing forward the top two tiles in each of the eight tile stacks that are created {forming the "dragon head"). The Dealer shall deliver the four tiles pushed forward to the starting position. The

top tile from each of the four stacks of four tiles to the Dealer's left (the "phoenix tail") shall be delivered to the next position. The Dealer shall deliver the top two tiles from each of the two stacks on the Dealer's right to the third position and the top tile from each of the four stacks on the Dealer's left to the fourth position. This procedure shall be repeated until four tiles have been delivered to all eight positions.

- j. Dragon head and phoenix tail from the left: The Dealer shall indicate the use of dragon head and phoenix tail from the left $\frac{1}{2}$ y placing all four tiles in the first and second stacks from the Dealer's left directly on top of the four tiles in the third and fourth stacks from the Dealer's left and then pushing forward the top two tiles in each of the eight tile stacks that are created (forming the "dragon head"). The Dealer shall deliver the four tiles pushed forward to the starting position. The top tile from each of the four stacks of four tiles to the Dealer's right (the "phoenix tail") shall be delivered to the next position. The Dealer shall deliver the top two tiles from each of the two stacks on the Dealer's left to the third position and the top tile from each of the four stacks on the Dealer's right to the fourth position. This procedure shall be repeated until four tiles have been delived to all eight positions.

(12) After all the stacks of tiles have been dealt, the Dealer shall, without exposing the tiles, collect any stacks

dealt to a position where there is no wager and place the stacks with the dead Hand on the Layout to the left of the Dealer in front of the table inventory container.

- (13) Once all tiles have been dealt and any tiles dealt to positions with no wagers have been collected, the Dealer shall place the cover on the pai gow shaker and shake the shaker once. The pai gow shaker shall then be placed to the right of the Dealer.
- (14) If the tiles dealt to the Dealer have not been previously collected, after each player has set his or her two Hands and placed them on the Layout, the two Hands of the Dealer shall then be set. Once the Dealer has formed a high and low Hand, the Dealer shall expose the Hands of the bank and determine if the Hands of the Dealer are higher in rank than the Hands of the bank. If the Dealer wins, the tiles of the Dealer shall be stacked face up to the right of the table inventory container with the amount wagered by the Dealer against the bank placed on top. If the Dealer pushes, the Dealer shall return the amount wagered by the Dealer against the bank to the table inventory container. If the Dealer loses, the amount wagered by the Dealer against the bank shall be moved to the center of the Layout.
- (15) If banking is in effect, once the Dealer has determined the outcome of the wager of the Dealer against the bank, if any, the Dealer shall expose the Hands of each player starting with the player farthest to the right of the Dealer and proceeding counterclockwise around the table. The Dealer shall compare the high and low Hand of each

player to the high and low Hand of the bank and shall announce if the wager shall win, lose or be considered a push against the bank. All losing wagers shall be immediately collected and placed in the center of the table. After all Hands have been exposed, all winning wagers, including the Dealer's wager, shall be paid by the Dealer with the gaming chips located in the center of the table. If this amount becomes exhausted before all winning wagers have been paid, the Dealer shall collect from the bank an amount equal to the remaining winning wagers and place that amount in the center of the Layout. The remaining winning wagers shall be paid from the amount in the center of the Layout. If, after collecting all losing wagers and paying all winning wagers, there is a surplus in the center of the table, this amount shall be charged a five percent Vigorish in accordance with (h) above. Once the Vigorish has been paid, the remaining amount shall be given to the bank.

- (16) If co-banking is in effect, once the Dealer has set the co-bank Hand pursuant to (5) above, the Dealer shall expose the Hands of each player starting with the player farthest to the right of the Dealer and proceeding counterclockwise around the table. The Dealer shall compare the high and low Hand of each player to the high and low Hand of the bank and shall announce if the wager shall win, lose or be considered a push against the bank. All losing wagers shall be immediately collected and placed in the center of the table. After all Hands have been exposed, all winning wagers shall be paid by the Dealer with the gaming chips located in the center of the table. If this amount becomes exhausted before all

winning wagers have been paid, the Dealer shall collect from the co-bank, an amount equal to one-half of the remaining winning wagers and place that amount in the center of the Layout. The Dealer shall remove an amount equal to one-half of the remaining winning wagers from the table inventory container and place that amount in the center of the Layout. The remaining winning wagers shall be paid from the total amount in the center of the Layout. If, after collecting all losing wagers and paying all winning wagers, there is a surplus in the center of the table, this amount will be counted and the Dealer shall place one-half of this amount into the table inventory container. The Dealer shall collect a five percent Vigorish in accordance with (h) on the remaining amount and place the Vigorish amount in the table inventory container. The remaining amount shall then be given to the co-bank.

(17) Immediately after a winning wager of the Dealer is paid, this amount and the original wager shall be returned to the table inventory container.

(18) Each player who has a winning wager against the bank shall pay a five percent Vigorish on the amount won to the Dealer, in accordance with (h).

(k) Irregularities; invalid roll of the dice

(1) If the Dealer uncovers the pai gow shaker and all three dice do not land flat on the bottom of the shaker, the Dealer shall call a "No Roll" and reshake the dice.

- (2) If the Dealer uncovers the pai gow shaker and a die or dice fall out of the shaker, the Dealer shall call a "No Roll" and reshake the dice.
 - (3) If the Dealer incorrectly totals the dice and deals the tiles to the wrong positions, all Hands shall be void and the Dealer shall reshuffle the tiles.
 - (4) If the Dealer exposes any of the tiles dealt to a player, the player has the option of voiding the Hand. Without looking at the unexposed tiles, the player shall make the decision either to play out the Hand or to void the Hand.
 - (5) If a tile dealt to the Dealer, bank, the dead Hand or any position where there is no wager is exposed, all Hands shall be void and the tiles shall be reshuffled.
 - (6) If the Dealer does not set his or her Hands in the manner submitted to the SGA pursuant to (h), the Hands shall be reset in accordance with such submission and the round of play completed.
- (1) A player wagering on more than one betting area
- (1) Except as provided in (i) (6), the Nation Gaming Operation may, in its discretion, permit a player to wager on no more than two betting areas at a pai gow table, which areas must be adjacent to each other.
 - (2) If the Nation Gaming Operation permits a player to wager on two adjacent betting areas, the tiles dealt to each betting area shall be played separately. If the two

wagers are not equal, the player shall be required to rank and set the Hand with the larger wager before ranking and setting the other Hand. If the amounts wagered are equal, each Hand shall be played separately in a counterclockwise rotation with the first Hand being ranked and set before the player proceeds to rank and set the second Hand. Once a Hand has been ranked and set and placed face down on the Layout, the Hand may not be changed.

(m) Minimum wagers and maximum wagers

The Nation Gaming Operation shall determine the minimum and maximum wagers at each table. The amounts of the minimum and maximum wagers shall be conspicuously posted on a sign at each table

17.Red Dog (Acey Duecey)

(a) Equipment

- (1) Table. Red Dog shall be played at a table having on one side places for the players and on the opposite side a place for the Dealer. Each Red Dog table shall have a Drop Box and a tip box attached to it on the Dealer's side of the gaming table in a location approved in writing by the SGA and the SGO.
- (2) Layout. The Layout for a Red Dog table shall be approved in writing by the SGA and the SGO and shall contain, at a minimum:
 - a. The name or logo of the Nation Gaming Operation; and
 - b. Specific areas designated for the placement of wagers, which betting areas shall not exceed seven in number.
- (3) Discard rack. In order to collect the cards at the conclusion of a round of play and at such other times as provided in the Compact of its Appendices, each Red Dog table shall have a discard rack securely attached to the top of the Dealer's side of the table. The height of each discard rack shall equal the height of the cards, stacked one on top of the other, contained in the total number of decks that are to be used in the dealing shoe at that table; provided, however, that a taller discard rack may be used if such rack has a distinct and clearly

visible mark on its side to show the exact height for a stack of cards equal to the total number of cards contained in the number of decks to be used in the dealing shoe at that table. Whenever a double shoe is used at a Red Dog table, the same number of decks shall be used in each side of the double shoe, and the height and marking requirements as set forth above for the table's discard rack shall be determined from the number of decks used in one side of the shoe.

- (4) Automated card shuffling device. Shall mean an approved device which can automatically perform the requirements of a Shuffle.
- (5) Cards; number of decks; value of cards; dealing shoe
 - a. Red Dog shall be played with at least one deck of cards with backs of the same color and design and two additional cutting cards. The cutting cards shall be opaque and in a solid color readily distinguishable from the color of the backs and edges of the playing cards, as approved in writing by the SGA and the SGO.
 - b. The "value" (from lowest to highest) of the cards in each deck shall be as follows:
 1. Any card from 2 to 10 will have its face value;
 2. Any Jack will have a value of 11;

3. Any Queen will have a value of 12;
 4. Any King will have a value of 13; and
 5. Any Ace will have a value of 14.
- c. All cards in the game of Red Dog shall be dealt from a dealing shoe, which shall meet the requirements of Appendix B, Section 71.
- d. All cards opened for use on a table and dealt from a manual or automated dealing shoe shall be changed at least once every eight hours³. All cards opened for use on a table and dealt from the Hand shall be changed at least every four hours.

(b) Opening of the table for gaming

- (1) After receiving the one or more decks of cards at the table, the Dealer shall sort and inspect the faces and backs of the cards and the floorperson assigned to the table shall verify the inspection.
- (2) Following the inspection of the cards by the Dealer and the verification by the floorperson assigned to the table, the cards shall be spread out face up on the table for visual inspection by the first player to arrive at the table. The cards shall be spread out by deck according to suit and in sequence. The cards in each suit shall be laid out in sequence within the suit.
- (3) After the player is afforded an opportunity to visually

inspect the cards, the cards shall be turned face down on the table, mixed thoroughly by a "Washing" of the cards and stacked.

(c) Shuffle and cut of the cards

- (1) Immediately prior to commencement of play and after each shoe of cards is dealt, the Dealer shall Shuffle the cards so that they are randomly intermixed. The Nation Gaming Operation may also Shuffle the cards at the completion of any round of play.
- (2) After the cards have been Shuffled, the Dealer shall offer the stack of cards to be cut, with the backs facing away from the Dealer, to the player at the farthest point to the right of the Dealer; provided, however, if the game is just beginning, the cards shall be offered to the first player at the table. If the first player offered the cards refuses the cut, the cards shall be offered to each other player moving clockwise around the table until a player accepts the cut. If no player accepts cut, the Dealer shall cut the cards.
- (3) The person making the cut shall place the cutting card in the stack at least 10 cards from either end. Once the cutting card has been inserted, the Dealer shall take all the cards in front of the cutting card and place them on the back of the stack. The Dealer shall then insert the cutting card in a position approximately one-quarter of the way from the back of the stack. The stack of cards shall then be inserted into the dealing shoe for commencement of play.

- (4) After the cards have been cut but before any cards have been dealt, a Gaming Facility Supervisor may require the cards to be recut if he or she determines that the cut was performed improperly or in any way that might affect the integrity or fairness of the game. If a recut is required, the cards shall be recut, at the Nation Gaming Operation's option, by the player who last cut the cards, or by the next person entitled to cut the cards, as determined by paragraph (c) (2) above.

(d) Procedures for dealing cards

- (1) After each full set of cards is placed in the shoe, the Dealer shall remove the first card therefrom face down and place it in the discard rack. Each new Dealer who comes to the table shall also discard (burn) one card as described herein before the new Dealer deals any card in a round of play. The burn card shall be disclosed if requested by a player.
- (2) The Dealer shall remove a card from the shoe with his or her left hand, turn it face up, and then place it on the appropriate area of the Layout with his or her right hand.

(e) Procedures for each round of play; wagers; Payouts

- (1) Except as otherwise provided in this section, all wagers shall be made prior to the first card being dealt for each round of play.
- (2) All wagers at Red Dog shall be made by placing gaming

chips and, if applicable, a Match Play Coupon on the appropriate area of the Red Dog Layout.

- (3) To begin each round of play, the Dealer shall place the first card, face up, on the box farthest to the Dealer's left. The Dealer shall then place the second card, face up, on the box farthest to the Dealer's right.
- (4) Once the first card of each round has been removed from the shoe by the Dealer, no participant in the game shall handle, remove or alter any wager until a decision has been rendered and implemented with respect to that wager.
- (5) If the initial two cards dealt have values that are consecutive, the Dealer shall announce "The cards are consecutive - tie Hand," all wagers shall be void and the round of play shall be concluded.
- (6) If the initial two cards dealt are of identical value, the Dealer shall announce "We have a pair" and shall immediately draw a third card and place it face up in the middle box.
 - a. If the third card dealt is identical in value to the initial two cards, the Dealer shall announce "Three-of-a-kind," the players shall win and all wagers shall be paid at odds of 11 to 1.
 - b. If the third card dealt is not identical in value to the initial two cards, the Dealer shall announce "No three-of-a-kind--tie Hand," all wagers shall be void and the round of play shall be concluded.

- (7) If the initial two cards dealt are neither consecutive nor a pair, the Dealer shall announce the "spread" and place a marker on the corresponding spread on the Layout. The spread for each round of play shall be a number from 1 to 11 inclusive and shall be determined by the number of cards whose value can fall between the values of the initial two cards dealt. Examples of this rule are as follows:
- a. If the initial two cards dealt are a 4 and a 7, then the spread shall be two (that is, two cards, the 5 and 6, have a value that falls between 4 and 7);
 - b. If the initial two cards dealt are a 9 and a King, then the spread shall be three (that is, three cards, the 10, Jack and Queen, have a value that falls between the 9 and King).
- (8) If there is a spread after the initial two cards are dealt, a player shall have the option to make a raise wager in support of the player's original wager by placing on the designated raise area of the Layout an amount not in excess of the player's original wager. All raise wagers shall be made immediately after the initial two cards have been dealt but prior to the third card being dealt.
- (9) After all raise wagers have been made but prior to dealing the third card, the Dealer shall announce "Raises closed." The Dealer shall then draw a third card, place it face up on the box between the initial two cards and

announce the value of the third card. Thereafter, the Dealer shall first collect all losing wagers or pay all winning wagers as follows:

- a. The player shall win if the value of the third card dealt is between the values of the initial two cards dealt and shall lose if the value of the third card dealt is not between the values of the initial two cards dealt;
- b. All winning wagers and raise wagers shall be paid at Payout odds determined by the spread for that round of play, as listed below:

<u>Spread</u>	<u>Payout Odds</u>
1	5 to 1
2	4 to 1
3	2 to 1
4 through 11	1 to 1

- c. The Nation Gaming Operation may, in its discretion, offer to all patrons at a Red Dog table higher Payout odds than those listed in subparagraph (e) (9) (b) above, provided that the Nation Gaming Operation properly notices, in accordance with written directions established by the SGA, any increase in the Payout odds. In no event may the Nation Gaming Operation decrease the Payout odds

below those required by subparagraph (e) (9) (b) above.

- (10) At the conclusion of each round of play, all cards on the Layout shall be picked up by the Dealer and placed in the discard rack in order and in such a way that they can be readily arranged to reconstruct the Hand in case of a question or dispute.
- (11) Whenever the cutting card is reached in the deal of the cards, the Dealer shall continue dealing the cards until that round of play is completed. The Dealer shall then reshuffle the cards.

(f) Irregularities

- (1) A card found face up in the shoe shall not be used in the game and shall be placed in the discard rack.
- (2) A card drawn in error without its face being exposed shall be used as though it were the next card from the shoe.
- (3) If a third card is drawn and exposed to the players prior to the Dealer announcing "Raises closed," the card shall be discarded and each player shall be given the option of playing out the round or voiding the round of play. Prior to dealing another third card, the Dealer shall return the original wager and any raise wager to each player who has chosen to void the round of play.

(g) Minimum wagers and maximum wagers.

The Nation Gaming Operation shall determine the minimum and maximum wagers at each table. The amounts of the minimum and maximum wagers shall be conspicuously posted on a sign at each table.

18. Roulette

(a) Equipment.

- (1) Roulette wheel. Each Roulette wheel shall be of a single zero variety or a double zero variety as described and depicted below:
 - a. Each single zero Roulette wheel shall have 37 equally spaced compartments around the wheel where the Roulette ball shall come to rest. The Roulette wheel shall also have a ring of 37 equally spaced areas to correspond to the position of the compartments with one marked zero and colored green and the others marked 1 to 36 and colored alternately red and black which numbers shall be arranged around the wheel as approved in writing by the SGA and the SGO. The color of each compartment shall either be a corresponding color to those depicted on the ring or a neutral color as approved by the SGA and the SGO in writing.
 - b. Each double zero Roulette wheel shall have 38 equally spaced compartments around the wheel where the Roulette ball shall come to rest. The Roulette wheel shall also have a ring of 38 equally spaced areas to correspond to the position of the compartments with one marked zero and colored green, one marked double-zero (00) and colored green, and the others marked 1 to 36 and colored alternately red and black which numbers shall be arranged around the wheel as approved in writing by

the SGA and the SGO. The color of each compartment shall either be a corresponding color to those depicted on the ring or a neutral color as approved by the SGA and the SGO in writing.

- c. A double zero Roulette wheel may be used as a single zero Roulette wheel, provided that:
 1. If a double zero table Layout is used, the "00" wager area on the Layout is obscured with a cover or other approved device which clearly indicates that such a wager is not available; and
 2. Appropriate signage is posted at the Roulette table to notify players that:
 - A. A double zero Roulette wheel is being used as a single zero Roulette wheel, and that double zero (00) is not an available wager;
 - B. If the Roulette ball comes to rest in a compartment marked double zero (00), the spin will be declared void and the wheel and ball will be respun; and
 - C. Wagers on red, black, odd, even, 1 to 18 and 19 to 36 shall be lost if the Roulette ball comes to rest in a compartment marked zero (0).

- (2) Layout. The Layout for a Roulette table shall be approved in writing by the SGA and the SGO and shall contain, at a minimum:
 - a. The name or logo of the Nation Gaming Operation; and
 - b. Specific areas for the placement of wagers authorized in subdivision (d) below.
 - (3) Table. Each Roulette table shall have a Drop Box and a tip box attached to it, in locations approved by the SGA and the SGO in writing.
 - (4) Roulette Balls. Balls used in gaming at Roulette shall be made completely of a non-metallic substance and not be less than 12/16 of an inch nor more than 14/16 of an inch in diameter unless otherwise approved by the SGA and the SGO in writing.
 - (5) Non-value Roulette chips. Wagering in the game of Roulette shall only be made with non-value Roulette chips meeting the requirements of Appendix B, Section 62.
 - (6) Optical Roulette reader (Optional). Optical Roulette reader which shall read the Roulette winning number and transmit it to the table terminal and to the Roulette display may be used.
- (b) Roulette personnel and their duties.
- (1) A Roulette table with a single or double Layout is

usually worked by two persons. The person who spins the wheel and deals the game is called the Dealer. His or her assistant is called a checker or check racker.

- (2) Dealer. The Dealer is in charge of the conduct of the game. His or her main duties are: spinning the wheel, throwing the Roulette ball, announcing winners, collecting losing wagers, paying off winning wagers, and collecting, entering or placing jackpot wagers.
- (3) Checker or Check Racker. The checker or check racker separates and stacks the losing wagers that have been collected or swept from the Layout by the Dealer. He or she may help the Dealer pay off winning wagers.

(c) The conduct of Roulette.

- (1) All wagers at the Roulette games shall be made with chips or non-value Roulette chips.
- (2) No person at a Roulette table shall be issued or permitted to game with non-value chips that are identical in color and design to value chips or to non-value chips being used by another person at that same table. The Nation Gaming Operation shall determine whether a person shall be permitted to wager a value chip with a Match Play Coupon at any Roulette table at which Match Play Coupons are being accepted.
- (3) Each player shall be responsible for the correct positioning of his or her wager on the Roulette Layout regardless of whether he or she is assisted by the

Dealer. Each player must ensure that any instructions he or she gives to the Dealer regarding the placement of a wager are correctly carried out.

- (4) All wagers at Roulette shall be made by placing gaming chips and, if applicable, a Match Play Coupon on the appropriate areas of the Roulette Layout.
 - (5) The Roulette ball shall be spun by the Dealer in a direction opposite to the rotation of the wheel and shall complete at least four revolutions around the track of the wheel to constitute a valid spin.
 - (6) While the ball is still rotating in the track around the wheel, the Dealer shall call "no more bets" and make a visible hand motion indicating no more bets are to be accepted.
 - (7) Upon the ball coming to rest in a compartment, the Dealer shall announce the number of such compartment and shall place a point marker to be known as a "crown" or "dolly" on that number on the Roulette Layout.
 - (8) After placing the crown on the Layout the Dealer shall first collect all losing wagers and then payoff all winning wagers.
- (d) Permissible wagers. The permissible wagers in the game of Roulette shall be:
- (1) Inside Bets.

- a. Single-number bet or straight-up bet. The player places his or her wager squarely on one number on the Layout, making certain that the wager does not touch any of the lines enclosing the number. This indicates that the player is betting that number to win.
- b. The symbols 0 or 00. These can be played the same as any straight or single-number bet by placing the wager on either 0 or 00.
- c. Two-number bet or split bet. The player places his or her wager directly on any line separating any two numbers. Any wager placed on the line separating the second Dozen betting space from the 3rd Dozen betting space shall be considered the same as a wager placed on the line separating the 0 from the 00. If the winning number is one of the two wagered on, the player wins.
- d. Three-number bet or street bet. The player places his or her wager on the outside line of the Layout. This indicates that he or she is betting the three numbers opposite the wager, going across the Layout (street). If the winning number is one of these three, the player wins.
- e. Four-number bet, square bet, quarter bet or corner bet. The player places his or her wager on the intersection of the lines between any four numbers. If any one of these four numbers wins, the player collects.

- f. Five-number bet or line bet. The player places his or her wager on the line separating the 1,2 and 3 from the 0 and 00 spaces at a corner intersection. This indicates that the player is betting that one of the numbers 1, 2, 3, 0 or 00 will win.
- g. Six-number bet or line bet. The player places his or her wager on the intersection of the side line and a line between two streets. If any of these six numbers wins, the player wins.

(2) Outside Bets.

- a. Twelve-number bet or column bet. The player places his or her wager on one of the three blank spaces at the bottom of the Layout (some Layouts have three squares marked 1st, 2nd, 3rd). This indicates that the player is betting 12 the vertical numbers above the space wagered on.
- b. Dozens or twelve-number bet. The player places his or her wager on one of the spaces of the Layout marked 1st 12, 2nd 12 or 3rd 12. The 1st 12 indicates that the player is betting on the numbers 1 to 12 inclusive; the 2nd 12, the numbers 13 to 24 inclusive; and the 3rd 12, the numbers 25 to 36 inclusive.
- c. Low-number bet (1 to 18). The player places his or her wager on the Layout space marked 1 to 18, which indicates that the player is betting on the numbers 1 to 18 inclusive.

- d. High-number bet (19 to 36). The player places his or her wager on the Layout space marked 19 to 36, which indicates that the player is betting on the numbers 19 to 36 inclusive.
- e. Black color bet. The player places his or her wager on a space of the Layout marked Black. (Some Layouts have a large diamond-shaped design instead of the word Black.) The player is betting that the winning color will be black.
- f. Red color bet. The player places his or her wager on the space of the Layout marked Red, or the red diamond, and is betting that the winning color will be red.
- g. Odd-number bet. The player places his or her wager on the space of the Layout marked odd. The player is betting that the winning number will be an odd number.
- h. Even-number bet. The player places his or her wager on the space of the Layout marked even. The player is betting that the winning number will be even.

(3) Additional bets.

The Nation Gaming Operation may offer additional bets that have been approved in writing by the SGA and the SGO.

(e) Payout odds. The Nation Gaming Operation shall pay off each winning wager at the game of Roulette at no less than the odds listed below:

(1) Inside Bets.

Single-number bet or straight-up bet	35 to 1
Symbol 0 or 00 bet	35 to 1
Two-number bet or split bet	17 to 1
Three-number bet or street bet	11 to 1
Four-number bet	8 to 1
Square bet	8 to 1
Quarter bet	8 to 1
Corner bet	8 to
Five-number bet or line bet	6 to 1
Six-number bet or line bet	5 to 1

(2) Outside Bets.

Twelve-number bet or column bet	2 to 1
Dozens or twelve-number bet	2 to 1

Low-number bet (1 to 18)	1 to 1
High-number bet (19 to 36)	1 to 1
Black color bet	1 to 1
Red color bet	1 to 1
Odd-number bet	1 to 1
Even-number bet	1 to 1

(f) Irregularities

- (1) If the ball is spun in the same direction as the wheel, the Dealer shall announce "No Spin" and shall attempt to remove the Roulette ball from the wheel prior to its coming to rest in one of the compartments.
- (2) If the Roulette ball does not complete four revolutions around the track of the wheel, the Dealer shall announce "No Spin" and shall attempt to remove the ball from the wheel prior to its coming to rest in one of the compartments.
- (3) If a foreign object enters the wheel prior to the ball coming to rest, the Dealer shall announce "No Spin" and shall attempt to remove the ball from the wheel prior to its coming to rest in one of the compartments. If the Roulette ball leaves the wheel during its revolution around the track, the Dealer will announce "No Spin" and the Roulette ball will be inspected before being placed

back into play.

(g) Inspection and security procedures

- (1) Prior to opening a Roulette table for gaming activity, a Gaming Facility Supervisor, a member of the security department or another person authorized in writing by the SGA shall:
 - a. Inspect the Roulette table and Roulette wheel for any magnet or contrivance that could affect the fair operation of such wheel;
 - b. Inspect the Roulette wheel to assure that it is level and rotating freely and evenly;
 - c. Inspect the Roulette wheel to assure that all parts are secure and free from movement;
 - d. Inspect the Roulette ball by passing it over a magnet or compass to assure its non-magnetic quality; and
 - e. Conform that the Layout and signage comply with this section, if a double zero Roulette wheel is being used as a single zero Roulette wheel.
- (2) If a Nation Gaming Operation uses a Roulette wheel which has external movable parts, any adjustments to the movable parts shall be made by a Gaming Facility Supervisor or a member of the gaming facility maintenance department, in the presence of a security department

member. Adjustments to the movable parts of a Roulette wheel that is located on the gaming floor, shall only be made:

- a. When the gaming facility is not open to the public; or
 - b. If the Roulette wheel is moved to a secure location outside the gaming facility as approved by the SGA in writing.
 - c. All adjustments shall be completed prior to the required inspections in paragraph (g) (1) above.
- (3) The Nation Gaming Operation may replace any of the movable parts at any time, provided, however, if any one or more of the movable parts are external then an inspection must be completed by the SGA prior to reopening the Roulette wheel and table for gaming activity.
 - (4) A log shall be maintained which shall include, at a minimum, the date, the Roulette table number, whether an adjustment or replacement was completed and the signature of the person making the adjustment or replacement.
 - (5) When a Roulette table is not open for gaming activity, the Roulette wheel shall be secured by placing a cover over the entire wheel and securely locking such cover to the Roulette table.
- (h) Minimum wagers and maximum wagers

The Nation Gaming Operation shall determine the minimum and maximum wagers at each table. The amounts of the minimum and maximum wagers shall be conspicuously posted on a sign at each table. Payout odds shall be conspicuously posted on a sign at each Roulette table.

19. Sic Bo

(a) Equipment

- (1) A sealed container, to be known as a "Sic Bo shaker," which shall be used to shake the dice in order to arrive at the winning combinations. The Sic Bo shaker shall be designed and constructed to contain, at a minimum, the following specifications:
 - a. The Sic Bo shaker shall have a compartment to secure the three dice and a separate cover which conceals the dice while the Dealer is shaking it. The compartment to secure the three dice shall be transparent and the cover which conceals the dice shall be opaque;
 - b. The Sic Bo shaker shall have the capability of being sealed or locked in order to ensure the integrity of the dice contained therein;
 - c. The Sic Bo shaker shall be secured to the Sic Bo table when the table is open for gaming activity.
- (2) Three dice, each of which shall conform to the specifications and requirements of Appendix B, Section 66;
- (3) Layout. The Layout for a Sic Bo table shall be approved in writing by the SGA and the SGO and shall contain, at a minimum:

- a. The name, trade name or logo of the Nation Gaming Operation; and
- b. Specific areas designated for the placement of the wagers; and
- c. The Payout odds.

(4) Table. Sic Bo shall be played at a table which shall:

- a. have an electrical device which, when the numeric value of each die has been entered, shall cause the winning combinations to be illuminated. Each possible dice combination shall have the capability to be illuminated, if it is a winning combination, after the numeric value of each die has been entered into the electrical device by the Dealer.
- b. have a Drop Box and a tip box attached to the Dealer's side of the gaming table, but on opposite sides of the Dealer, as approved in writing by the SGA and the SGO.

(b) Permissible wagers. Each player may wager that the three dice, after being shaken and uncovered by the Dealer, will result in particular combinations. The following shall constitute the definitions of permissible combinations upon which a player may wager at the game of Sic Bo:

- (1) "Three-of-a-kind" shall mean a wager which shall win if the same number is showing on the upward sides of all three dice and the player selected that number to appear

on all three dice.

- (2) "Two of a kind" shall mean a wager which shall win if the same number is showing on two of the upward sides of the three dice and the player selected that number to appear on two out of the three dice.
- (3) "Any three-of-a-kind" shall mean a wager which shall win if the numeric value on all three upward sides of the dice is the same and the player wagered that any of the numbers 1 through 6 would appear on all of the three dice.
- (4) "Total Value Bet" shall mean a wager which shall win if the numeric total of all three dice equals the total of the number wagered.
- (5) "Two Dice Combination" shall mean a wager which shall win when the player wagered that a combination of two specific but different numeric values would appear on at least two of the dice and the two numeric values chosen are showing.
- (6) "Small Bet" shall mean a wager which shall win if the numeric total of all three dice equals any one of the following totals: 4, 5, 6, 7, 8, 9, or 10 and shall lose if any other numeric total is shown or if three-of-a-kind appears.
- (7) "Big Bet" shall mean a wager which shall win if the numeric total of all three dice equals any one of the following totals: 11, 12, 13, 14, 15, 16 or 17 and shall

lose if any other numeric total is shown or if three-of-a-kind appears.

- (8) "One of a kind" shall mean a wager which shall win if one or more of the three dice shows a numeric value equal to the number wagered.

(c) Wagers

- (1) All wagers at Sic Bo shall be made by placing gaming chips and, if applicable, a Match Play Coupon on the appropriate areas of the Sic Bo Layout.
- (2) Each player shall be responsible for the correct positioning of his or her wagers on the Sic Bo Layout regardless of whether the player is assisted by the Dealer. Each player must ensure that any instructions given to the Dealer regarding the placement of wagers are correctly carried out.
- (3) Each wager shall be settled strictly in accordance with its position on the Layout when the dice come to rest and the numeric value showing on the upward sides of each die has been entered into the electrical device and illuminated at the table.

(ci) Payout odds

- (1) Payout odds shall be listed on each Sic Bo Layout.
- (2) The Nation Gaming Operation shall pay off winning wagers at the game of Sic Bo at no less than the odds listed

below:

<u>Wager</u>	<u>Payout Odds</u>
Three-of-a-kind	150 to 1
Two of a kind	8 to 1
Any three-of-a-kind	24 to 1
Total value of 4	50 to 1
Total value of 5	18 to 1
Total value of 6	14 to 1
Total value of 7	12 to 1
Total value of 8	8 to 1
Total value of 9	6 to 1
Total value of 10	6 to 1
Total value of 11	6 to 1
Total value of 12	6 to 1
Total value of 13	8 to 1
Total value of 14	12 to 1

Total value of 15	14 to 1
Total value of 16	18 to 1
Total value of 17	50 to 1
Any two dice combination	5 to 1
Small Bet	1 to 1
Big Bet	1 to 1
One of a kind	1 to 1

- (3) "One of a kind" shall be paid at 2 to 1, if two of the dice show the same numeric value, and at 3 to 1, if all three dice show the same numeric value.

(e) Procedures for opening and dealing the game

- (1) Prior to opening the Sic Bo table for gaming activity, the floorperson assigned to the Sic Bo table shall inspect the electrical device in order to ensure that the table is in proper working order. At a minimum, the inspection shall be completed by entering three numeric values into the electrical device and verifying that all winning combinations are properly illuminated.
- (2) Prior to shaking the Sic Bo shaker, the Dealer shall orally announce "no more bets" and make a visible hand motion indicating no more bets are to be accepted.

- (3) Once "No more bets" has been announced and signaled, the Dealer shall place the cover on the Sic Bo shaker and shake the Sic Bo shaker at least three times so as to cause a random mixture of the dice.
 - (4) The Dealer shall then remove the cover from the Sic Bo shaker, announce the numeric value of each die and enter the numeric value of each die into the electrical device on the table. The electrical device shall then cause only the winning combinations to be illuminated on the Sic Bo Layout.
 - (5) After the winning combinations have been illuminated, the Dealer shall first collect all losing wagers and then pay off all winning wagers at the odds currently being offered in accordance with subdivision (d). The Sic Bo shaker shall remain uncovered until all winning wagers have been paid.
 - (6) After all losing wagers have been collected and all winning wagers paid, the Dealer shall clear the previously illuminated winning combinations from the table.
- (f) Irregularities
- (1) If the Dealer uncovers the Sic Bo shaker and all three dice do not land flat on the bottom of the shaker, the Dealer shall call a "No Roll."
 - (2) If the electrical device malfunctions and the Sic Bo shaker has been uncovered, the Dealer shall, in the

presence of the Gaming Facility Supervisor, collect all losing wagers and pay all winning wagers. Once the wagers on the Layout have been settled, all gaming at Sic Bo shall cease until the electrical device has been fixed.

(g) Minimum wagers and maximum wagers

The Nation Gaming Operation shall determine the minimum and maximum wagers at each table. The amounts of the minimum and maximum wagers shall be conspicuously posted on a sign at each table.

20. Super Pan

(a) Equipment

- (1) Table. Super Pan shall be played at a table having on one side places for the players and on the opposite side a place for the Dealer. Each Super Pan table shall have a Drop Box and a tip box attached to the Dealer's side of the gaming table in a location approved in writing by the SGA and the SGO.
- (2) Layout. A Layout for a Super Pan table shall be approved in writing by the SGA and the SGO and shall contain, at a minimum:
 - a. The name or logo of the gaming facility;
 - b. Specific areas designated for the placement of wagers on the "Banker's Hand," "Players Hand" and "Tie Hand";
 - c. Areas designated for the placement of cards for the "Player's Hand" and "Banker's Hand;" and
 - d. Betting space for seven players.
- (3) Cards. Super Pan shall be played with at least six decks of cards, which shall meet the requirements of Appendix B, Section 69, with backs of the same color and design and two additional cutting cards. The cutting cards shall be opaque and in a solid color readily distinguishable from the color of the backs and edges of

the playing cards, as approved in writing by the SGA and the SGO. All cards opened for use on a Super Pan table shall be changed at least once every four hours.

- (4) A dealing shoe, which shall meet the requirements of Appendix B, Section 71.
- (5) Discard rack. In order to collect the cards at the conclusion of a round of play and at such other times as provided in the Compact or its Appendices, each Super Pan table shall have a discard rack securely attached to the top of the Dealer's side of the table. The height of each discard rack shall equal the height of the cards, stacked one on top of the other, contained in the total number of decks that are to be used in the dealing shoe at that table; provided, however, that a taller discard rack may be used if such rack has a distinct and clearly visible mark on its side to show the exact height for a stack of cards equal to the total number of cards contained in the number of decks to be used in the dealing shoe at that table. Whenever a double shoe is used at a Super Pan table, the same number of decks shall be used in each side of the double shoe, and the height and marking requirements as set forth above for the table's discard rack shall be determined from the number of decks used in one side of the shoe.
- (6) Automated card shuffling device (Optional). An automated card shuffling device is a device which can automatically perform a Shuffle. Such a device shall meet the requirements of Appendix B, Section 71.

(7) Super Pan shaker and dice.

- a. Super Pan shall be played with three dice which shall be maintained at all times inside a Super Pan shaker. The Super Pan shaker shall meet the requirements of a pai gow shaker as set forth in Appendix B, Section 79. The dice shall conform to the specifications and requirements of Appendix B, Section 66.
- b. The Super Pan shaker and the dice contained therein shall be the responsibility of the Dealer and shall never be left unattended while at the table.
- c. No dice that have been placed in a Super Pan shaker for use in gaming shall remain on a table for more than 24 hours.

(b) Value of the Cards. The "value" of the cards in each deck, regardless of suit, will be as follows:

- (1) Any card from 2 to 6 shall have its face value;
- (2) Any Jack, King or Queen shall have a value of 10;
- (3) Any Ace shall have a value of 1; and
- (4) The "Point Count" of a Hand shall be a single digit number from 0 to 9 inclusive and shall be determined by totaling the value of the cards in the Hand. If the total of the cards in a Hand is a two digit number, the left digit of such number

shall be discarded as having no value and the right digit shall constitute the point count of the Hand.

- (c) Opening the table for Super Pan; Shuffle and cut of the cards
- (1) After receiving the six decks of cards at the table, the Dealer shall sort and inspect the faces and backs of the cards and shall remove all cards with the face value of 7, 8, 9 and 10. The floorperson assigned to the table shall visually verify the inspection of the cards and secure the removed cards *in* a locked drawer in the Pit stand.
 - (2) Immediately prior to the commencement of play and after each round of play has been completed, the Dealer shall "wash" and Shuffle the cards either manually or by use of an automated card shuffling device so that the cards are randomly intermixed. Upon completion of the Shuffle, the Dealer or device shall place the deck of cards in a single stack; provided, however, that nothing in this section shall be deemed to prohibit an automated card shuffling device which, upon completion of the shuffling of the cards, inserts the cards directly into an automated or manual dealing shoe.
 - (3) After the cards have been Shuffled and stacked, the Dealer shall:
 - a. If the cards were Shuffled using an automated card shuffling device, deal or deliver the cards; or
 - b. If the cards were Shuffled manually, cut the cards

in accordance with the procedures set forth in paragraphs (c) (4) through (c) (6) below.

- (4) Upon completion of a manual Shuffle, the Dealer shall place the stack of cards on top of the cover card. Thereafter, the Dealer shall offer the stack of cards to be cut, with the backs facing up and faces facing the Layout, to the player determined pursuant to paragraph (5) below. If no player accepts the cut, the Dealer shall cut the cards.
- (5) The cut of the cards shall be offered to players in the following order:
 - a. The first player to the table, if the game is just beginning;
 - b. The player at the farthest position to the right of the Dealer; provided, the offer to cut the cards shall rotate in a counterclockwise manner after the player to the far right of the Dealer has been offered the cut.
- (6) The player or Dealer making the cut shall place the cutting card in the stack at least ten cards from either end. Once the cutting card has been inserted, the Dealer shall take the cutting card and all the cards on top of the cutting card and place them on the bottom of the stack. The Dealer shall then remove the cover card and place it on the bottom of the stack. Thereafter, the Dealer shall remove the cutting card and, at the discretion of the Nation Gaming Operation, either place

it in the discard rack or use it as an additional cutting card to be inserted four cards from the bottom of the deck. The Dealer shall then deal or deliver the cards.

- (7) After the cards have been cut but before any cards have been dealt, a Gaming Facility Supervisor may require the cards to be recut if he or she determines that the cut was performed improperly or in any way that might affect the integrity or fairness of the game. If a recut is required, the cards shall be recut, at the Nation Gaming Operation's option, by the player who last cut the cards, or by the next person entitled to cut the cards, as determined by paragraphs (c) (4) and (c) (5) above.
- (8) Whenever there is no gaming activity at a Super Pan table which is open for gaming, the cards shall be spread out on the table either face up or face down. If the cards are spread face down, they shall be turned face up once a player arrives at the table. After the first player is afforded an opportunity to visually inspect the cards, the procedures outlined in paragraphs (c) (2) and (c) (3) above shall be completed.

(d) Wagering at Super Pan

- (1) All wagers at Super Pan shall be made by placing gaming chips and, if applicable, a Match Play Coupon on the appropriate betting area of the Super Pan Layout.
- (2) All wagers at Super Pan shall be placed prior to the Dealer announcing and signaling with a Hand motion "No more bets."

- (3) No wager shall be made, increased or withdrawn after the Dealer has announced "No more bets," and making a visible hand motion indicating "no more bets" will be accepted.
- (e) Permissible wagers.
- (1) Players may only wager against the Dealer on whether their "Player's Hand" will have a point count higher than the "Banker's Hand." The wager shall only win if their "Player's Hand" point count is higher than the "Banker's Hand".
 - (2) All tie Hands shall be a "push" or a stand off.
- (f) Procedure for determining the starting position for dealing cards or delivering stacks of cards
- (1) In order to determine the starting position for the dealing of cards or the delivery of stacks of cards for the game of Super Pan, the Nation Gaming Operation may, in its discretion, use the procedure authorized in paragraphs (f) (2) or (f) (3) below.
 - (2) The Dealer shall shake the Super Pan shaker and dice at least three times so as to cause a random mixture of the dice.
 - a. The Dealer shall then remove the lid covering the Super Pan shaker, total the dice and announce the total.

b. To determine the starting position, the Dealer shall count counterclockwise around the table, with the position of the Dealer considered number one, and continuing around the table with each betting position counted in order, including the Dealer, regardless of whether there is a wager at the position, until the count matches the total of the three dice.

c. Examples are as follows:

1. If the dice total 8, the Dealer would receive the first card or stack of cards; or
2. If the dice total 14, the sixth betting position would receive the first card or stack of cards.

d. After the dealing or delivery of the cards has been completed the Dealer shall place the cover on the Super Pan shaker and shake the shaker once. The Super Pan shaker shall then be placed to the right of the Dealer. The Super Pak shaker shall meet the requirements of a Pai gow shaker as set forth in Appendix B, Section 79.

(3) After the starting position for a round of play has been determined, the Nation Gaming Operation may, in its discretion, mark that position by the use of an additional cut card or similar object.

(g) The play of Super Pan

- (1) Starting at the first player and dealing clockwise, the Dealer will deal one card face up at a time to each position having a wager, and a face down card to the Dealer, until each player position has a total of three cards face up and the Dealer has three cards face down.
- (2) The three cards dealt to the players shall be placed face up in front of their respective bets.
- (3) Starting with the first player and proceeding clockwise, the Dealer shall deal face downwards a maximum of one additional card if the player signals for this draw option, and that card is placed perpendicular to the Hand so that it may be identified as the "draw card."
- (4) If the "Player's Hand" has a total of 0, 1, 2, 3, 4, or 5, he or she must draw. If the "Player's Hand" has a total of 6, 7, 8, or 9, the player must stand.
- (5) After all players have acted, the Dealer will announce "All Hands set." The Dealer shall then face the "Banker's Hand" and place it in front of the chip tray.
- (6) The Dealer will announce the banker's card total. If the "Banker's Hand" has a total of 0, 1, 2, 3, 4, or 5, he or she must draw. If the "Banker's Hand" has a total of 6, 7, 8, or 9, the Dealer must stand.
- (7) At the conclusion of setting his Hand and standing or drawing, the Dealer announces the "Banker's Hand" total.
- (8) Starting at the position designated by the first player,

and going clockwise, the Dealer shall turn each of the players' third cards face up.

- (9) A wager against the Dealer shall win if the "Player's Hand" has a point count higher than the "Banker's Hand" and lose if that point count is lower than the "Banker's Hand." All tie Hands shall be a "push" or a stand off.
 - (10) Starting at the first player and moving clockwise, all losing wagers are collected and cards are removed and placed in the discard rack.
 - (11) The Dealer shall then pay all winning wagers.
 - (12) The gaming operation may extract a charge, or Vigorish not to exceed ten (10) percent on any amount won. The gaming operation will collect the Vigorish from any winning wager at the time of the pay off.
- (h) Irregularities.
- (1) A card found face up in the shoe, shall not be used in the game and shall be placed in the discard rack.
 - (2) A card drawn in error without its face being exposed shall be used as though it were the next card from the shoe.
 - (3) After the initial three cards have been dealt to each player and a card is drawn in error and exposed to the players, it will be declared "dead". The Dealer shall place it, and an additional amount of cards equal to the

amount on the exposed card, in the discard rack.

- (4) If a player is mistakenly passed over during the draw, he or she has the option of standing or receiving a draw card after all other players have drawn, but before the Dealer acts on his or her Hand.
- (5) Any player or Dealer having the wrong number of cards has a fouled Hand. The player's wager is void.

(i) Minimum Wagers and Maximum Wagers.

The Nation Gaming Operation shall determine the minimum and maximum wagers at each table. The amounts of the minimum and maximum wagers shall be conspicuously posted on a sign at each table.

21. Under and Over Seven

(a) Equipment.

- (1) Table. Under and Over Seven shall be played at a table having on one side places for the players and on the opposite side a place for the Dealer. Each Under and Over Seven table shall have a Drop Box and a tip box attached to the Dealer's side of the gaming table, but on opposite sides of the Dealer, as approved in writing by the SGA and the SGO.
- (2) Layout. A Layout for a Under and Over Seven table shall be approved in writing by the SGA and the SGO and shall contain, at a minimum:
 - a. The name or logo of the Nation Gaming Operation; and
 - b. Specific areas designated for the placement of the wagers; and
 - c. The Payout odds.
- (3) If the dice are to be shaken, a sealed container, to be known as an "Under and Over Seven cage," which shall be used to shake the dice in order to arrive at the winning combinations. The dice used to play Under and Over Seven cage shall meet the requirements of Appendix B, Section 66. The Under and Over Seven cage shall be designed and constructed to contain, at a minimum, the following specifications:

- a. The Under and Over Seven cage shall have a compartment to secure the two dice and a separate cover which conceals the dice while the Dealer is shaking it. The compartment to secure the two dice shall be transparent and the cover which conceals the dice shall be opaque;
 - b. The Under and Over Seven cage shall have the capability of being sealed or locked in order to ensure the integrity of the dice contained therein;
 - c. The Under and Over Seven cage shall be secured to the Under and Over Seven table when the table is open for gaming activity.
- (b) Permissible wagers. Each player may wager that the two dice, after being shaken and uncovered by the Dealer will result in particular combinations. The following shall constitute the definitions of permissible combinations upon which a player may wager at the game of Under and Over Seven:
- (1) Under Seven. Under seven shall mean a wager which shall win if the numeric total of the two dice is 2, 3, 4, 5 or 6.
 - (2) Over Seven. Over seven shall mean a wager which shall win if the numeric total of the two dice is 8, 9, 10, 11 or 12.
 - (3) Seven. Seven shall mean a wager which shall win if the numeric total of the two dice is 7.

(c) Play of Under and Over Seven

- (1) All wagers at Under and Over Seven shall be made by placing gaming chips and, if applicable, a Match Play Coupon on the appropriate areas of the Under and Over Seven Layout prior to the Dealer announcing "No more bets" and making a visible hand motion indicating no more bets are to be accepted.
- (2) The Dealer shall place the cover on the Under and Over Seven cage and shake the Under and Over Seven cage at least three times so as to cause a random mixture of the dice.
- (3) The Dealer shall announce the total value of the two dice. The Dealer shall then remove the cover from the Under and Over Seven cage and announce the total numeric value of the two dice.
- (4) All losing wagers shall be immediately collected by the Dealer and placed in the table inventory container.
- (5) The Dealer shall pay all winning wagers consistent with the requirements of subdivision (d) below beginning with the location farthest to the right of the Dealer and continuing counterclockwise around the table.

(d) Payout odds. The Nation Gaming Operation shall pay off each winning wager at the game of Under and Over Seven at the odds listed below:

<u>Wager</u>	<u>Payout</u>
Under Seven	1 to 1
Over Seven	1 to 1
Seven	4 to 1

- (e) Irregularities. If the Dealer uncovers the Under and Over Seven cage and all three dice do not land flat on the bottom of the cage, the Dealer shall call a "No Roll."
- (f) Minimum Wagers and Maximum Wagers.

The Nation Gaming Operation shall determine the minimum and maximum wagers at each table. The amounts of the minimum and maximum wagers shall be conspicuously posted on a sign at each table.

22. Wheel games

(a) Equipment

- (1) Wheel. A mechanical, non-electronic wheel, circular in shape, with a diameter of not less than five (5) feet, The rim of the wheel shall be divided into fifty-four (54) equally spaced sections with twenty-three (23) sections containing a color, number or symbol indicating sixth prize, fifteen (15) sections containing a color, number or symbol indicating fifth prize, eight (8) sections containing a color, number or symbol indicating fourth prize, four (4) sections containing a color, number or symbol indicating third prize, two (2) sections containing a color, number or symbol indicating second prize, and two (2) sections containing a color, number or symbol indicating first prize. Each sections shall be covered with glass, plexiglass or a similar material.
- (2) Spindles. The equally spaced sections of the wheel referenced in paragraph (a) (1) above shall separated by spindles constructed of stainless steel, or such other rigid, inflexible substance.
- (3) Indicator. A stationary indicator constructed of leather, rubber, plastic or such other firm, pliable substance which shall be utilized to identify the section occupying the space between two immediately adjacent spindles as the winning section.
- (4) Layout. The Layout for a wheel game table shall be approved in writing by the SGA and the SGO, and shall

have imprinted thereon on, at a minimum, the following:

- a. The name, trade name or logo of the Nation Gaming Operation;
- b. Betting spaces which shall be used by patrons to place their wagers, which shall contain the following:
 1. Colors, numbers or symbols representing those monetary denominations for sixth prize, fifth prize, fourth prize, third prize, second prize and first prize; and
 2. The payoff odds.

(5) Mirror. A mirror shall be used as to enable the Dealer to view the wheel and determine a winning section without having to turn away from the Layout to do so.

(b) Wheel prize depictions. The sections required by paragraph (a) (1) above shall be arranged clockwise around the rim of the wheel with the color, number or symbol indicating or corresponding to each prize in the following order: first

prize, sixth prize, fifth prize, sixth prize, fourth prize, fifth prize, sixth prize, third prize, sixth prize, fourth prize, sixth prize, fifth prize, sixth prize, second prize, sixth prize, fifth prize, sixth prize, fourth prize, fifth prize, sixth prize, third prize, sixth prize, fifth prize, fourth prize, sixth prize, fifth prize, sixth prize, first prize, fifth prize, fourth prize, fifth prize, sixth prize, fifth prize, sixth prize, third prize, sixth prize, fourth

prize, sixth prize, fifth prize, sixth prize, second prize, sixth prize, fifth prize, sixth prize, fourth prize, fifth prize, sixth prize, third prize, sixth prize, fifth prize, fourth prize, sixth prize, fifth prize and sixth prize.

(c) Wagers

- (1) All wagers at Wheel games shall be made by placing gaming chips and, if applicable, a Match Play Coupon on the appropriate betting area of the Wheel games Layout.
- (2) All wagers at Wheel games shall be placed prior to the Dealer announcing and signaling with a hand motion "No more bets." No wager shall be made, increased or withdrawn after the Dealer has announced and signaled such.
- (3) The player(s) at a Wheel game whose wager(s) were placed in the betting space matching the section upon which the indicator comes to rest shall win and be paid off according to the odds reflected in subdivision (e) below.

(d) Procedure for dealing Wheel games

- (1) The Dealer shall spin the Wheel with enough force so as to ensure that the Wheel makes at least one full revolution.
- (2) After the Wheel stops rotating, the section where the indicator comes to rest between spindles shall be declared the winning result.

- (3) All losing wagers shall immediately be collected by the Dealer and placed in the table inventory container.
 - (4) Winning wagers shall then be paid in accordance with the Payout odds contained in subdivision (e).
- (e) Payout odds. The Nation Gaming Operation shall pay off each winning wager at any Wheel game at no less than the odds listed below:

Prize	<u>Odds</u>
First prize	45 to 1
Second prize	20 to 1
Third prize	10 to 1
Fourth prize	5 to 1
Fifth prize	2 to 1
Sixth prize	1 to 1

- (f) Irregularities

If the wheel does not make a complete revolution after the Dealer spins it pursuant to paragraph (d) (1) above, the Dealer shall call "No spin" and shall respin the Wheel.

- (g) Minimum wagers and maximum wagers.

The Nation Gaming Operation shall determine the minimum and maximum wagers at each table. The amounts of the minimum and maximum wagers shall be conspicuously posted on a sign at each table.

23. Casino War

- (a) Definitions; The following words and terms, when used in this subchapter, shall have the following meanings unless the context clearly indicates otherwise:
- (1) "Burn card" means a card that the Dealer removes from the shoe and places face down in the discard rack without revealing its rank to anyone.
 - (2) "Initial wager" means the wager that must be made by a player prior to any cards being dealt in order to participate in the round of play.
 - (3) "Original deal" means the first card that is dealt to each player and the Dealer to determine the initial wager in a round of play.
 - (4) "Round of play" or "round" means one complete cycle of play during which each player then playing at the table has placed an initial wager, has been dealt a card, has surrendered or gone to war, if appropriate, and has had his or her wagers paid or collected in accordance with this section.
 - (5) "Suit" means one of the four categories of cards: club, diamond, heart or spade.

- (6) "Tie Hand" means the rank of a player's card and the rank of the Dealer's card are equal.
 - (7) "Tie wager" means an optional wager, made at the same time as an initial wager or war wager, that the deal on which the tie wager is made will result in a tie Hand.
 - (8) "War" or "go to war" means the decision of a player, in accordance with the option offered by paragraph (h) (5) of this subsection, to place a war wager when there is a tie Hand on the original deal.
 - (9) "War deal" means the deal of the cards that follows the placement of a war wager.
 - (10) "War wager" means a wager, equal in amount to the player's initial wager, that is required to be made if the player elects to go to war.
- (b) Equipment
- (1) Casino war shall be played at a table having betting positions for no more than seven players on one side of the table and a place for the Dealer on the opposite side.
 - (2) The Layout for a casino war table shall be approved in writing by the SGA and the SGO and shall have imprinted thereon, at a minimum, the following:
 - a. The name or trade name of the Nation Gaming Operation;

- b. A separate designated betting area at each betting position for the placement of initial and war wagers;
 - c. A separate designated betting area for the placement of tie wagers; and
 - d. The Payout odds for a tie wager and war wager.
- (3) Each casino war table shall have a Drop Box and a tip box attached to it on the same side of the gaming table as, but on opposite sides of, the Dealer, in locations approved in writing by the SGA and the SGO.
- (4) In order to collect the cards at the conclusion of a round of play and at such other times as provided in the Compact or its Appendices, each three card poker table shall have a discard rack securely attached to the top of the Dealer's side of the table. The height of each discard rack shall equal the height of the cards, stacked one on top of the other, contained in the total number of decks that are to be used in the dealing shoe at that table. Notwithstanding, the foregoing, a taller discard rack may be used if such rack has a distinct and clearly visible mark on its side to show the exact height for a stack of cards equal to the total number of cards contained in the number of decks to be used in the dealing shoe at that table.
- (5) Casino war shall be played with six, seven or eight decks of cards with backs of the same color and design. Each

deck of cards shall consist of 52 cards that meet the requirements of Appendix B Section 69. The game of casino war shall also require one additional cutting card of a color that is readily distinguishable from the backs of the cards used to play the game. The cutting card shall be used in accordance with the procedures set forth in this subsection.

- (6) All cards used in casino war shall be dealt from a manual dealing shoe that meets the requirements of Appendix B section 71. The dealing shoe shall be located on the table to the left of the Dealer.
- (7) Nothing in this chapter shall preclude the Nation Gaming Operation from using an additional cutting card or similar object to conceal the last card of the stack of cards to be placed in the dealing shoe.
- (8) If an automated card shuffling device is utilized, casino war shall be played with at least 12 decks of cards in accordance with the following requirements:
 - a. Each deck of cards shall meet the requirements of Appendix B Section 69;
 - b. The cards shall be separated into two batches, with an equal number of decks included in each batch;
 - c. The backs of the cards in each batch shall be of the same color and design, but of a different color than the cards included in the other batch;

- d. One batch of cards shall be Shuffled and stored in the automated card shuffling device while the other batch is being dealt or used to play the game;
- e. Both batches of cards shall be continuously alternated in and out of play, with each batch being used for every other dealing shoe; and
- f. The cards from only one batch shall be placed in the discard rack at any given time.

(c) Casino war card rankings:

The rank of the cards used in casino war, for the purpose of determining a winning Hand, shall be, in order from the highest to lowest rank: ace, king, queen, jack, 10, 9, 8, 7,

6, 5, 4, 3 and 2. The suit of a card shall have no effect on its rank.

(d) Opening of the table for gaming

- (1) After receiving six, seven or eight decks of cards at the table in accordance with Appendix B Section 70, the Dealer shall sort and inspect the cards and the floorperson assigned to the table shall verify the inspection as required by that section.
- (2) Following the inspection of the cards by the Dealer and the verification by the floorperson assigned to the table, the cards shall be spread out face up on the table for visual inspection by the first player to arrive at the table. The cards shall be spread out according to

suit and in sequence.

- (3) After the first player is afforded an opportunity to visually inspect the cards, the cards shall be turned face down on the table, mixed thoroughly by a "Washing" or "Chemmy Shuffle" of the cards and stacked. Once the cards have been stacked, they shall be Shuffled in accordance with Nation Gaming Operation Shuffle procedures.
- (4) If an automated shuffling device is utilized, all the decks in one batch of cards shall be spread for inspection on the table separate from the decks in the other batch of cards. After the player or players is afforded an opportunity to visually inspect the cards, each batch of cards shall separately be turned face downward on the table and stacked.
- (5) All cards opened for use on a table shall be changed at least once each gaming day. Procedures for compliance with this section shall be approved in writing by the SGA and the SGO.

(e) Shuffle and cut of the cards

- (1) Immediately prior to commencement of play and after each shoe of cards is dealt, the Dealer shall Shuffle the cards, either manually or by use of an automated card shuffling device, so that the cards are randomly intermixed. Upon completion of the Shuffle, the Dealer or device shall place the deck of cards in a single stack.

- (2) After the cards have been Shuffled and stacked, the Dealer shall offer the stack of cards to be cut, with the backs facing away from the Dealer, to players in the following order:
 - a. The first player to the table, if the game is just beginning;
 - b. The player on whose betting area the cutting card appeared during the last round of play;
 - c. The player at the farthest point to the right of the Dealer if the cutting card appeared on the Dealer's Hand during the last round of play; or
 - d. The player at the farthest point to the right of the Dealer if the reshuffle was initiated at the discretion of the Nation Gaming Operation.
- (3) If the player designated in (2)b. above refuses to cut, the Dealer shall offer the cut to each other player moving clockwise around the table until a player accepts the cut. If no player accepts the cut, the Dealer shall cut the cards.
- (4) The player or Dealer making the cut shall place the cutting card in the stack at least 10 cards in from either end.
- (5) Once the cutting card has been inserted, the Dealer shall take all cards in front of the cutting card and place them on the back of the stack. Thereafter, the Dealer

shall insert the cutting card in the stack at a position at least approximately one-quarter of the way in from the back of the stack. The stack of cards shall then be inserted into the dealing shoe for commencement of play.

- (6) A reshuffle of the cards in the shoe shall take place after the cutting card is reached in the shoe as provided for in paragraph (g) (4) of this subsection.
- (7) If there is no gaming activity at the casino war table, the cards shall be removed from the dealing shoe and the discard rack, and spread out on the table either face up or face down. If the cards are spread face down, they may be turned face up once a player arrives at the table. After the first player is afforded an opportunity to visually inspect the cards, the cards shall be turned face downward on the table.
- (8) If there is no automated shuffling device in use, the cards shall be mixed thoroughly by a Washing or Chemmy Shuffle of the cards, stacked, then Shuffled and cut in accordance with this section.
- (9) If an automated shuffling device is in use, the cards shall be stacked and placed into the automated shuffling device to be Shuffled. The batch of cards already in the Shuffler shall then be removed. Unless a player so requests, the batch of cards removed from the Shuffler need not be spread for inspection and reshuffled prior to being dealt, if:
 - a. The automated card shuffling device stores a single

batch of Shuffled cards inside the Shuffler in a secure manner approved by the SGA in writing; and

- b. The Shuffled cards have been secured, released and prepared for play in accordance with procedures approved by the SGA in writing.

(f) Wagers

- (1) All wagers at casino war shall be made by placing gaming chips or plaques and, if applicable, Match Play Coupons on the appropriate betting area of the casino war Layout. An oral wager accompanied by cash shall not be accepted at the game of casino war.
- (2) Except as provided in paragraph (h) (5) of this subsection, all wagers at casino war shall be placed prior to the Dealer announcing "No more bets" in accordance with the dealing procedures set forth in section (g) of this subsection. Once a wager has been placed, no player shall handle, remove or alter the wager unless and until the Dealer indicates that the wager has been decided in the player's favor as provided in this subchapter.

(g) Procedure for dealing the cards

- (1) Prior to starting the first round of play after the cards have been cut and placed in the dealing shoe pursuant to paragraph (e) (5) of this subsection, the Dealer shall remove the first card from the shoe face down and, without revealing its rank to anyone, place it in the

discard rack, which shall be located on the table in front of or to the right of the Dealer. Each new Dealer who comes to the table shall also discard one burn card before dealing any cards in a round of play.

- (2) Prior to dealing any cards, the Dealer shall announce "No more bets." Each card shall be removed from the dealing shoe with the left hand of the Dealer and placed face up on the appropriate area of the Layout with the right hand of the Dealer.
 - (3) The Dealer shall, starting with the player farthest to the Dealer's left and continuing in a clockwise manner, deal the cards as follows:
 - a. One card face up to each player who has placed an initial wager in accordance with paragraph (f) (2) of this subsection; and
 - b. One card face up to the Dealer.
 - (4) Whenever the cutting card is reached in the deal of the cards, the Dealer shall continue dealing the cards until that round of play is completed after which the cards shall be reshuffled.
 - (5) No player shall touch any card used in the game of casino war other than the cutting card.
- (h) Procedures for completion of each round of play; collection and payment of wagers

- (1) After the dealing procedures required by subsection (g) above have been completed, the Dealer shall, beginning from the Dealer's left and proceeding around the table in a clockwise direction, compare the rank of each player's card with that of the Dealer's card and settle initial all and tie wagers.
 - a. If a player's card is lower in rank than the Dealer's card, the player shall lose his or her initial wager and, if applicable, tie wager.
 - b. If a player's card is higher in rank than the Dealer's card, the player shall win his or her initial wager and, if applicable, lose his or her tie wager.
 - c. If the player's card and the Dealer's card are of equal rank (a tie Hand), the player shall be afforded the options specified in (3) below as to his or her initial wager and, if applicable, win his or her tie wager.
- (2) All losing initial wagers and tie wagers shall be collected by the Dealer and placed in the table inventory container. All winning initial wagers and tie wagers shall be paid by the Dealer in accordance with the Payout odds provided in section (i) of this subsection.
- (3) If a player has a tie Hand, the player shall be offered one of the following options:
 - a. The player may surrender one-half of his or her

initial wager and end his or her participation in that round of play. If a player selects this option, the Dealer shall collect one-half of the player's initial wager and place it in the table inventory container. The Dealer shall return the remaining one-half of the initial wager to the player. The Dealer shall then proceed around the table in a clockwise direction, repeating the process for each player with a tie Hand who selects this option.

b. The player may surrender his or her entire initial wager and place a war wager pursuant to (5) below.

(4) After settling all initial wagers and tie wagers on the original deal, the Dealer shall collect the cards of all players except for the cards of those players with a tie Hand who have elected to go to war. The collected cards shall be placed in the discard rack in a manner that permits the reconstruction of each Hand of the original deal in case of a question or dispute.

(5) If any player elects to make a war wager upon the occurrence of a tie Hand, the Dealer shall confirm the placement of the war wager and collect the full amount of the player's initial wager and place it in the table inventory container. The player's card and the Dealer's card from the original deal shall remain exposed during the war deal. The Dealer shall offer any player who has elected to go to war the opportunity to place a tie wager on the war deal.

- (6) The war deal shall begin with the Dealer discarding three burn cards and then dealing the next card face up to the player farthest to the Dealer's left who has placed a war wager. The player's war deal card shall be placed on the table adjacent to the player's card from the original deal. The Dealer shall then proceed around the table in a clockwise direction, repeating the process for each player who has placed a war wager and the Dealer.
- (7) After the dealing procedures required by (6) above have been completed, the Dealer shall, beginning from the Dealer's left and proceeding around the table in a clockwise direction, compare the rank of each player's card from the war deal to the Dealer's card from the war deal and settle all war and tie wagers.
 - a. If the player's card in the war deal is lower in rank than the Dealer's card in the war deal, the player shall lose his or his war wager and, if applicable, tie wager.
 - b. If the player's card in the war deal is higher in rank than the Dealer's card in the war deal, the player shall win his or her war wager and, if applicable, lose his or her tie wager.
 - c. If the player's card and the Dealer's card in the war deal are of equal rank, the player shall win his or her war wager and, if applicable, tie wager.
- (8) All losing war wagers and tie wagers shall be collected by the Dealer and placed in the table inventory

container. All winning war wagers and tie wagers shall be paid in accordance with the Payout odds set forth in section (i) of this subsection. After the collection of all losing wagers and the payment of all winning wagers from the war deal, the Dealer shall remove all remaining cards from the table and place them in the discard rack in a manner that permits the reconstruction of each Hand of the war deal in case of a question or dispute.

(i) Payout odds

(1) Winning wagers shall be paid as follows:

- a. An initial wager shall be paid at odds of 1 to 1.
- b. A tie wager shall be paid at odds of 10 to 1.
- c. A war wager shall be paid at odds of 2 to 1, unless the war deal results in a tie Hand, in which case a war wager shall be paid at odds of 3 to 1.

(ii) Irregularities

(1) A card found face up in the shoe while the cards are being dealt shall not be used in the game and shall be placed in the discard rack. If more than one card is found face up in the shoe while the cards are being dealt, all Hands shall be void and the cards shall be reshuffled.

(2) A card drawn from the shoe in error without its face being exposed shall be used as though it was next card

from the shoe.

- (3) If a card is not dealt to a player's initial wager or tie wager in the original deal, the wager shall be void and the player shall be included in the next round of play.
- (4) If an automated shuffling device is being used and the device jams, stops shuffling during the Shuffle, or fails to complete a Shuffle cycle, the cards shall be reshuffled in accordance with procedures approved by the SGA in writing.

- (k) Minimum wagers and maximum wagers.

The Nation Gaming Operation shall determine the minimum and maximum wagers at each table. The amounts of the minimum and maximum wagers shall be conspicuously posted on a sign at each table.

24. Spanish Blackjack

(a) Definitions.

The following words and terms, when used in this Section, shall have the following meanings unless the context clearly indicates otherwise:

- (1) "Blackjack" shall mean an ace and any card having a point value of 10 dealt as the initial two cards to a player or a Dealer, except that this shall not include an ace and a 10 point value card dealt to a player who has split pairs.
- (2) "Hard total" shall mean the total point count of a Hand which contains no aces or which contains aces that are each counted as one in value.
- (3) "Push" shall mean a tie between the Hand of the player and that of the Dealer, except for Hands containing a point count of 21 or a blackjack.
- (4) "Rescue" is as defined in subsection (j) (4) below.
- (5) "Soft total" shall mean the total point count of a Hand, which contains an ace that is counted as 11 in value.
- (6) "Suit" shall mean one of the four categories of cards: club, diamond, heart or spade.

(b) Spanish 21 table; physical characteristics

- (1) Spanish 21 shall be played at a table having betting positions for no more than six players on one side of the table and a place for the Dealer on the opposite side.
- (2) The Layout for a Spanish 21 table shall be approved in writing by the SGA and the SGO and shall have imprinted thereon, at a minimum, the following:
 - a. The name or logo of the Nation Gaming Operation;
 - b. A separate designated betting area at each betting position for the placement of the following wagers:
 - i. The required Spanish 21 wager; and
 - ii. An optional match-the-dealer wager;
 - c. The following inscriptions:
 - i. "Blackjack Pays 3 to 2:"
 - ii. "Dealer Must Draw to 16 and Stand on All 17's;"
 - iii. "Insurance Pays 2 to 1."
 - d. The Payout odds for each of the wagers listed in this section unless the odds are included in the sign required below; and
 - e. The Payout odds for the match-the-dealer wager unless the odds are included in the sign required

below.

- (3) The Nation Gaming Operation shall post a sign approved by the SGA, in writing, at each Spanish 21 table, which explains:
 - a. That doubled down Hands are not eligible for the additional Payouts in Section (f) (6);
 - b. That doubled down Hands and split Hands are not eligible for the additional Payouts in Section (f) (7 l) ; and
 - c. The Payout odds for the match-the-dealer wager, if those Payout odds are not imprinted on the Layout.

- (4) Each Spanish 21 table shall have a Drop Box and a tip box attached to it on the same side of the gaming table as, but on opposite sides of, the Dealer, in locations approved by the SGA and the SGO in writing.

- (5) In order to collect the cards at the conclusion of a round of play as required by these rules and at such other times as provided in the rules of the Nation Gaming Operation, each Spanish 21 table shall have a discard rack securely attached at the top of the Dealer's side of the table. The height of each discard rack shall equal the height of the cards, stacked one on top of the other, contained in the total number of decks that are to be used in the dealing shoe at that table; provided, however, that a taller discard rack may be used if such rack has a distinct and clearly visible mark on its side

to show the exact height for a stack of cards equal to the total number of cards contained in the number of decks to be used in the dealing shoe at that table. Whenever a double shoe is used at a Spanish 21 table, the same number of decks shall be used in each side of the double shoe, and the height and marking requirements as set forth above for the table's discard rack shall be determined from the number of decks used in one side of the shoe.

- (6) A Spanish 21 table may have attached to it, as approved by the SGA and the SGO in writing, a card reader device that permits the Dealer to read his or her hole card in order to determine if the Dealer has a blackjack in accordance with these rules. If a Spanish 21 table has an approved card reader device attached to it, the floorperson assigned to the table shall inspect the card reader device at the beginning of each gaming day. The purpose of this inspection shall be to insure that there has been no tampering with the device and that it is in proper working order.

(c) Cards; number of decks; rank of cards

- (1) Spanish 21 shall be played with six or eight decks of cards, with backs of the same color and design and one additional cutting card. The decks shall meet the requirements of Appendix B section 69 and shall consist of 48 cards, with the 10 of each suit having been removed from each deck during the inspection required by Appendix B Section 70. The cutting card shall be opaque and a solid color readily distinguishable from the color of the

backs and edges of the playing cards, as approved by the SGA and the SGO in writing.

- (2) The point value of the cards contained in each deck shall be as follows:
 - a. Any card from 2 to 9 shall have its face value;
 - b. Any Jack, Queen or King shall have a value of 10;
 - c. An ace shall have a value of 11, unless that value would give a player or the Dealer a score in excess of 21, in which case it shall have a value of one.

(d) Opening of the table for gaming

- (1) After receiving the decks of cards at the table in accordance with Appendix B Section 70, the Dealer shall sort and inspect the cards, and the floorperson assigned to the table shall verify that inspection. If the decks contain the 10 of any suit, the Dealer shall remove these cards from the decks, and the floorperson shall verify that all such cards have been removed from each deck, and shall destroy them in a manner approved by the SGA in writing.
- (2) Following the inspection of the cards by the Dealer and the verification by the floorperson assigned to the table, the cards shall be spread out face up on the table for visual inspection by the first player to arrive at the table. Each deck of cards shall be spread out separately, according to suit and in sequence.

- (3) After the first player has been afforded an opportunity to visually inspect the cards, the cards shall be turned face down on the table, mixed thoroughly by a "Washing" or "Chemmy Shuffle" of the cards, and stacked. If during the mixing or the stacking process a card is turned over and exposed to the players, the cards shall be re-mixed. Once the cards have been stacked, they shall be Shuffled in accordance with the Shuffle procedures.
 - (4) All cards opened for use on a Spanish 21 table shall be changed at least once every 24 hours.
- (e) Shuffle and cut of the cards
- (1) Immediately prior to the commencement of play and after each shoe of cards has been completed, the Dealer shall Shuffle the cards, either manually or by use of an automated card shuffling device, so that the cards are randomly intermixed. Upon completion of the Shuffle, the Dealer or device shall place the deck of cards in a single stack.
 - (2) After the cards have been Shuffled and stacked, the Dealer shall:
 - a. If the cards were Shuffled using an automated card shuffling device, place the stack of cards in the dealing shoe and deal the cards in accordance with the procedures set forth in these rules; provided, however, that nothing herein shall be deemed to prohibit the use of an automated card shuffling

device which, upon completion of the shuffling of the cards, inserts the stack of cards directly into a dealing shoe; or

- b. If the cards were Shuffled manually, cut the cards in accordance with the procedures set forth in (e) (3) below.

(3) If a cut of the cards is required, the Dealer shall offer the stack of cards to be cut, with the backs facing away from the Dealer, to the player determined pursuant to (4) below. If no player accepts the cut, the Dealer shall cut the cards.

(4) The cut of the cards shall be offered to players in the following order:

- a. The first player to the table, if the game is just beginning; or
- b. The player at the farthest position to the right of the Dealer; provided, however, that if there are two or more consecutive rounds of play, the offer to cut the cards shall rotate in a counter-clockwise manner after the player to the far right of the Dealer has been offered the cut.

(5) The player or Dealer making the cut shall place the cutting card in the stack at least 10 cards from either end. Once the cutting card has been inserted, the Dealer shall take the cutting card and all the cards on top of the cutting card and place them on the bottom of the

stack. The Dealer shall then take the entire stack of cards that was just Shuffled and align them along the side of the dealing shoe. Thereafter, the Dealer shall insert the cutting card in the stack at a position at least approximately one-quarter of the way in from the back of the stack. The stack of cards shall then be inserted into the dealing shoe for commencement of play.

- (6) After the cards have been cut and before any cards have been dealt, a Gaming Facility Supervisor may require the cards to be recut if he or she determines that the cut was performed improperly or in any way that might affect the integrity or fairness of the game. If a recut is required, the cards shall be recut, at the Nation Gaming Operations option, by the player who last cut the cards, or by the next person entitled to cut the cards, as determined by (4)a. and (4)b. above.
- (7) A reshuffle of the cards in the shoe shall take place after the cutting card is reached in the shoe as provided for in Section (h) (10), provided, however, that the Nation Gaming Operation may determine after each round of play that the cards should be reshuffled.
- (8) The Nation Gaming Operation may submit to the SGA for approval in writing the proposed Shuffle, cut card placement, number of cut cards (to include Shuffle techniques without the use of any cut cards) , location of where the Shuffle takes place, who is responsible for shuffling, shuffling equipment (dealing shoes or other dealing devices) and burn card procedures.

(9) Whenever there is no gaming activity at a Spanish 21 table that is open for gaming, the cards shall be spread out on the table either face up or face down. If the cards are spread face down, they may be turned face up once a player arrives at the table. After the first player is afforded an opportunity to visually inspect the cards, the procedures outlined in Section (d) (3) shall be completed.

(f) Wagers; Payout odds

(1) Prior to the first card being dealt for each round of play, each player at the game of Spanish 21 shall make a wager against the Dealer, which shall win if:

- a. The score of the player is 21 or less and the score of the Dealer is in excess of 21;
- b. The score of the player exceeds that of the Dealer without either exceeding 21;
- c. The player has achieved a score of 21 in two cards and the Dealer has achieved a score of 21 in two or more cards; or
- d. The player has achieved a score of 21 in more than two cards and the Dealer has achieved a score of 21 in more than two cards.

(2) Except as otherwise provided in (1)c. and d. above, a wager that is made in accordance with this section shall be void if the score of the player is the same as the

Dealer. However, a wager shall lose if the player has 21 in more than two cards and the Dealer has a blackjack.

- (3) All wagers at Spanish 21 shall be made by placing gaming chips or plaques and, if applicable, a Match Play Coupon on the appropriate betting areas of the table Layout. An oral wager accompanied by cash may be accepted, provided it is confirmed by the Dealer and Gaming Facility Supervisor, and that such cash is expeditiously converted into gaming chips or plaques.
- (4) Except as otherwise provided in this subchapter, no wager shall be made, increased or withdrawn after the first card of the respective round has been dealt.
- (5) After each round of play is complete, the Dealer shall collect all losing wagers and pay off all winning wagers. Except as provided in (6) and (7) below, winning wagers made in accordance with (f) (1)c. above shall be paid at odds of 3 to 2, and all winning wagers made in accordance with (f) (1)a., (1)b., or (1)d., above shall be paid at odds of 1 to 1.
- (6) Notwithstanding the provisions of (f) (5) above, the Nation Gaming Operation shall pay the following Payout odds for winning wagers made in accordance with (f) (1) above unless the player has doubled down, in which case all of the following wagers shall only be paid at odds of 1 to 1:
 - a. Three cards consisting of the 6, 7 and 8 of mixed suits shall be paid at odds of 3 to 2;

- b. Three cards consisting of the 6, 7 and 8 of the same suit shall be paid at odds of 2 to 1, except that three cards consisting of the 6, 7 and 8 of spades shall be paid at odds of 3 to 1;
 - c. Three cards consisting of three sevens of mixed suits shall be paid at odds of 3 to 2;
 - d. Three cards consisting of three sevens of the same suit shall be paid at odds of 2 to 1, except that three cards consisting of three sevens of spades shall be paid at odds of 3 to 1;
 - e. Five cards totaling 21 shall be paid at odds of 3 to 2;
 - f. Six cards totaling 21 shall be paid at odds of 2 to 1; and
 - g. Seven or more cards totaling 21 shall be paid at odds of 3 to 1.
- (7) In addition to the Payouts required by (6)d. above, a winning Hand that consists of three sevens of the same suit when the Dealer's exposed card is also a seven of any suit shall be paid an additional fixed Payout of \$1,000 if the player's original wager was \$5.00 or more but less than \$25.00, or \$5,000 if the player's original wager was \$25.00 or more. All other players at the table who placed a wager during that round of play shall also be paid an additional fixed Payout of \$50.00. Notwithstanding the foregoing, the additional fixed

Payouts required by this subsection shall not be applicable if the winning Hand had been doubled down pursuant to Section (j) or had been split pursuant to Section (k).

- (8) Except as expressly permitted by this subchapter, once the first card of any Hand has been removed from the shoe by the Dealer, no player shall handle, remove or alter any wagers that have been made until a decision has been rendered and implemented with respect to that wager.
- (9) Once an insurance wager, a wager to double down or a wager to split pairs has been made and confirmed by the Dealer, no player shall handle, remove or alter such wagers until a decision has been rendered and implemented with respect to that wager, except as expressly permitted by this section.
- (10) After the cards have been Shuffled pursuant to Section (e), The Nation Gaming Operation may, in its discretion, prohibit any person, whether seated at the gaming table or not, who does not make a wager on a given round of play from placing a wager on the next round of play and any subsequent round of play at that gaming table unless the casino chooses to permit the player to begin wagering or until a reshuffle of the cards has occurred.

(g) Match-the-Dealer wager

- (1) A player at a Spanish 21 table may make an additional "match-the-dealer" wager that either of the player's initial two cards will match the Dealer's up card in the

manner required by Section (g) (5) below. If both of the player's initial two cards match the Dealer's upcard, the player shall be paid in accordance with Section (g) (5) below for each matching card.

- (2) Prior to the first card being dealt for each round of play, a player who has placed the basic wager required by Section (f) of these rules may make an additional match-the-dealer wager, which shall be in an amount not less than \$1.00 and shall not exceed the lesser of:
 - a. The amount of the wager made by the player pursuant to Section (f) (1) of these rules; or
 - b. A maximum amount established by the Nation Gaming Operation.
- (3) A match-the-dealer wager shall be made by placing gaming chips or plaques and, if applicable, a Match Play Coupon on the appropriate area of the Spanish 21 Layout, except that an oral wager accompanied by cash may be accepted provided that it is confirmed by the Dealer and Gaming Facility Supervisor at the table prior to the first card being dealt to any player, and that such cash is expeditiously converted into gaming chips or plaques.
- (4) Immediately after the second card is dealt to each player and the Dealer, and prior to any additional cards being dealt to any player at the table or the Dealer and before any card reader device is utilized, all losing match-the-Dealer wagers shall be collected by the Dealer, and then all winning match-the-Dealer wagers shall be paid by the

Dealer, in accordance with Section (g) (5) below.

(5) All winning match-the-dealer wagers shall be paid at no less than the following odds:

a. If six decks of cards are being used:

Each matching card of a different suit	Each	4 to 1
matching card of the same suit		9 to 1

b. If eight decks of cards are being used:

Each matching card of a different suit	Each	3 to 1
matching card of the same suit		12 to 1

(6) A match-the-dealer wager shall have no bearing on any other wager made by a player at the game of Spanish 21.

(h) Procedure for dealing the cards

(1) All cards used in Spanish 21 shall be dealt from a dealing shoe specifically designed for such purpose and located on the table to the left of the Dealer.

(2) The Dealer shall remove cards from the shoe with his or her left hand, turn them face upwards, and then place them on the appropriate area of the Layout with his or her right hand, except that the Dealer has the option to deal hit cards to the first two betting positions with his or her left hand.

(3) After each full set of cards is placed in the shoe, the

Dealer shall remove the first card therefrom face downwards and place it in the discard rack, which shall be located on the table immediately to the right of the Dealer. Each New Dealer who comes to the table shall also burn one card as described in this subsection before the New Dealer deals any cards to the players. The burn card shall be disclosed if requested by a player.

- (4) At the commencement of each round of play, the Dealer shall, starting on his or her left and continuing around the table, deal the cards in the following order:
 - a. One card face upwards to each box on the Layout in which a wager is contained;
 - b. One card face upwards to the Dealer; and
 - c. A second card face upwards to each box in which a wager is contained.
- (5) After two cards have been dealt to each player, the Dealer shall, beginning from his or her left, announce the point total of each player. As each player's point total is announced, such player shall indicate whether he or she wishes to surrender, double down, split pairs, stand or draw, as provided for by this subchapter.
- (6) As each player indicates his or her decisions, the Dealer shall deal face upwards whatever additional cards are necessary to effectuate such decisions consistent with this subchapter and shall announce the new point total of such player after each additional card is dealt.

- (7) After the decisions of each player have been implemented and all additional cards have been dealt, the Dealer shall deal a second card face upward to himself or herself; provided, however, that such card shall not be removed from the dealing shoe until the Dealer has first announced "Dealer's Card, " which shall be stated by the Dealer in a tone of voice calculated to be heard by each person at the table. Any additional cards authorized to be dealt to the Hand of the Dealer by Subsection (m) of this subchapter shall be dealt face upwards at this time, after which the Dealer shall announce his or her total point count. In lieu of the requirements of this subsection, one of the procedures set forth in (h) (9) below may be implemented.
- (8) At the conclusion of a round of play, all cards still remaining on the Layout shall be picked up by the Dealer in order and in such a way that they can be readily arranged to indicate each player's Hand in case of question or dispute. The Dealer shall pick up the cards beginning with those of the player to his or her far right and moving counterclockwise around the table. After all the players' cards have been collected, the Dealer shall pick up his or her cards against the bottom of the players' cards and place them in the discard rack.
- (9) In lieu of the procedure set forth in (h) (7) above, the Nation Gaming Operation may permit the Dealer to deal his or her hole card face downward after a second card and before additional cards are dealt to the players; provided, however, that the Dealer shall not look at the face of the hole card until after all other cards

requested by the players pursuant to those regulations are dealt to them. Notwithstanding the foregoing, if the Nation Gaming Operation elects to utilize a card reader device and the Dealer's first card is an ace, king, queen or jack of any suit, the Dealer shall determine whether the hole card will give the Dealer a blackjack prior to dealing any additional cards to the players at the table, in accordance with procedures approved by the SGA in writing. The Dealer shall insert the hole card into the card reader device by moving the card face down on the Layout without exposing it to anyone, including the Dealer, at the table. If the Dealer has a blackjack, no additional cards shall be dealt and each player's wager shall be settled in accordance with Section (f) of these rules.

- (10) Whenever the cutting card is reached in the deal of the cards, the Dealer shall continue dealing the cards until that round of play is completed, after which the Dealer shall:
 - a. Collect the cards as provided in Section (h) (8) above;
 - b. Remove the cards remaining in the shoe and place them in the discard rack to ensure that no cards are missing; and then
 - c. Shuffle the cards.
- (11) No player or spectator shall handle, remove or alter any cards used to game at Spanish 21 except as explicitly

permitted by this Section and no Dealer or other casino employee shall permit a player or spectator to engage in such activity.

(12) Each player at the table shall be responsible for correctly computing the point count of his or her Hand, and no player shall rely on the point counts required to be announced by the Dealer under this section without checking the accuracy of such announcement himself or herself.

(i) Surrender

(1) After the first two cards are dealt to a player and the player's point total is announced, the player may elect to discontinue play on his or her Hand for that round by surrendering one-half of his or her wager. All decisions to surrender shall be made prior to such player indicating as to whether he or she wishes to double down, split pairs, stand or draw as provided in this Section.

- a. If the first card dealt to the Dealer was a 2, 3, 4, 5, 6, 7, 8 or 9, the Dealer shall immediately collect one-half of the wager and return one-half to the player.
- b. If the first card dealt to the Dealer was an ace, king, queen or jack, the Dealer shall place the player's wager on top of the player's cards. When the Dealer's second card is revealed, the Hand shall be settled by immediately collecting the entire wager if the Dealer has blackjack, or by

collecting one-half of the wager and returning one-half the wager to the player if the Dealer does not have blackjack.

- (2) If the player has made an insurance wager and then elects to surrender, each wager shall be settled separately and one wager shall have no bearing on the other.

(j) Doubling down; rescue

- (1) Except for blackjack, a player may elect to double down, that is, make an additional wager not in excess of the amount of his or her original wager, on the two or more cards dealt to that player, including any Hands resulting from a split pair, on the condition that one and only one additional card shall be dealt to each Hand on which the player has elected to double down. In such circumstances, the one additional card shall be dealt face upwards and placed sideways on the Layout.
- (2) A winning wager on a doubled Hand shall be paid in accordance with Section (f) (5) only, and the Payouts in Section (f) (6) and Section (f) (7) shall not be applicable to such wagers.
- (3) If a Dealer obtains blackjack after a player doubles down, the Dealer shall collect only the amount of the original wager of such player, and shall not collect the additional amount wagered in doubling down.
- (4) After the additional card required by Section (j) (1) above has been dealt to a doubled Hand, a player may

"rescue" (take back) the double down wager and forfeit his or her original wager, as long as the additional card does not result in the Hand having a point count in excess of 21.

(k) Splitting pairs

- (1) Whenever the initial two cards dealt to a player are identical in value, the player may elect to split the Hand into two separate Hands, provided that the player makes a wager on the second Hand so formed in an amount equal to his or her original wager.
- (2) When player splits pairs, the Dealer shall deal a card to and complete the player's decisions with respect to the first incomplete Hand on the Dealer's left before proceeding to deal any cards to any other Hand.
- (3) After a second card is dealt to a split pair, the Dealer shall announce the point total of such Hand and the player shall indicate his or her decision to stand, draw or double down with respect thereto. A player may also split pairs again if the second card dealt to an incomplete Hand is identical in value to the split pair; provided, however, that a player may split pairs a maximum of three times, or a total of four Hands.
- (4) If the Dealer obtains blackjack after a player splits pairs, the Dealer shall collect only the amount of the original wager of such player, and shall not collect the additional amount wagered in splitting pairs.

(5) The additional Payouts provided in Section (f) (7) are not applicable to a winning wager on a split Hand.

(1) Insurance

(1) Whenever the first card dealt to the Dealer is an ace, each player shall have the right to make an insurance bet, which shall win if the Dealer's second card is a King, Queen or Jack and shall lose if the Dealer's second card is an ace, 2, 3, 4, 5, 6, 7, 8 or 9.

(2) An insurance bet shall be made by placing on the insurance line of the Layout an amount not more than half the amount staked on the player's initial wager, except that a player may bet an amount in excess of half the initial wager to the next unit that can be wagered in chips, when because of the limitation of the value of chip denominations, half the initial wager cannot be bet. All insurance bets shall be placed immediately after the second card is dealt to each player and prior to any additional cards being dealt to any player at the table. If a card reader device is in use, all insurance wagers shall be placed prior to the Dealer inserting his or her hole card into the card reader device.

(3) All winning insurance bets shall be paid at odds of 2 to 1.

(4) All losing insurance bets shall be collected by the Dealer immediately after the Dealer draws his or her second face up card or discloses his or her hole card and before the Dealer draws any additional cards.

- (5) Insurance bets shall not apply to the match-the-dealer wager permitted pursuant to Section (g)

- (m) Drawing of additional cards by players and Dealers
 - (1) A player may elect to draw additional cards whenever his or her point count total is less than 21, except that:
 - a. A player having blackjack or a hard total of 21 may not draw additional cards; and
 - b. A player electing to double down shall draw one and only one additional card;
 - (2) Except as provided in Section (m) (3) below, a Dealer shall draw additional cards to his or her Hand until the Dealer has a hard or soft total of 17, 18, 19, 20 or 21, at which point no additional cards shall be drawn.
 - (3) A Dealer shall draw no additional cards to his or her Hand, regardless of the point count, if decisions have been made on all players' Hands and the point count of the Dealer's Hand will have no effect on the outcome of the round of play.

- (n) More than one player wagering on a box
 - (1) The Nation Gaming Operation may permit from one to three people to wager on any one box of the Spanish 21 Layout, provided that the first person wagering on that box consents to additional players wagering on such box.

- (2) Whenever more than one player wagers on a box, the player seated at that box shall have the exclusive right to call the decisions with regard to the cards dealt to such box. In the case of no seated player, the person with the highest wager in the box shall have such right.
 - (3) The player calling the decisions with respect to any box shall place his or her wager in that portion of the box closest to the Dealer's side of the table and all other players wagering on such box shall place their wagers immediately behind and in a vertical line with the aforementioned wager.
 - (4) Whenever more than one player is wagering on a box and the player calling the decisions decides to double down, the other players may also double their wagers but shall not be required to do so. In any event, only one additional card shall be dealt to the Hand that is subject to the double down decision.
 - (5) Whenever more than one player is wagering on a box and the player calling the decisions decides to split pairs, the other players shall either make an additional wager to cover each split pair or designate the split pair to which their initial wager shall apply.
 - (6) Whenever more than one player is wagering on a box, each player shall have the right to make an insurance bet, regardless of whether the other players on that box make such a bet.
- (o) Player wagering on more than one box

- (1) A player may only wager on one box at a Spanish 21 table unless the Nation Gaming Operation, in its discretion, permits the player to wager on additional boxes.

(p) Irregularities

- (1) A card found turned face upward in the shoe shall not be used in the game and shall be placed in the discard rack. If more than one card is found face up in the shoe during the dealing of the cards, the round of play shall be void and the cards shall be reshuffled.
- (2) If a 10 card of any suit is found in the shoe, it shall not be used in the game and shall be removed from the shoe and destroyed by a floorperson in a manner approved by the SGA in writing. If more than one 10 card is found in the shoe during the dealing of the cards, the round of play shall be void and the cards shall be reshuffled.
- (3) A card drawn in error without its face being exposed shall be used as though it were the next card from the shoe.
- (4) After the initial two cards have been dealt to each player and a card is drawn in error and exposed to the players, such card shall be dealt to the players or Dealer as though it were the next card from the shoe. Any player refusing to accept such card shall not have any additional cards dealt to him during such round. If the card is refused by the players and the Dealer cannot use the card, the card shall be burned.

- (5) If the Dealer has a point count of 17 or higher and accidentally draws a card for himself or herself, such card shall be burned.
- (6) If the Dealer misses dealing his or her first or second card to himself or herself, the Dealer shall continue dealing the first two cards to each player, and then deal the appropriate number of cards to himself or herself.
- (7) If there are insufficient cards remaining in the shoe to complete a round of play, all of the cards in the discard rack shall be Shuffled and cut according to the procedures in Section (e), the first card shall be drawn face downwards and burned, and the Dealer shall complete the round of play. Thereafter play will continue with the shoe.
- (8) If no cards are dealt to the player's Hand, the Hand is dead and the player shall be included in the next deal. If only one card is dealt to the player's Hand, at the player's option, the Dealer shall deal the second card to the player after all other players have received a second card.
- (9) If after receiving the first two cards, the Dealer fails to deal an additional card or cards to a player who has requested such cards, then, at the player's option, the Dealer shall either deal the additional cards after all other players have received their additional cards but prior to the Dealer revealing his or her hole card, or shall call the player's Hand dead and return the player's original wager.

- (10) If an automated card-shuffling device is being used and the device jams, stops shuffling during a Shuffle, or fails to complete a Shuffle cycle, the cards shall be reshuffled in accordance with procedures approved by the SGA in writing.
- (11) If the Dealer inserts his or her hole card into a card reader device when the value of his or her first card is not an ace, king, queen or jack, the Dealer, after notification to a Gaming Facility Supervisor, shall:
- a. If the particular card reader device is in use provides any player with the opportunity to determine the value of the hole card, call all Hands dead, collect the cards and return each player's wager; or
 - b. If the particular card reader device in use does not provide any player with the opportunity to determine the value of the hole card, continue play.
- (12) If a card reader device malfunctions, the Dealer may only continue dealing the game of Spanish 21 at that table using the dealing procedures applicable when a card reader device is not in use.
- (q) Minimum wagers and maximum wagers.
- (1) The Nation Gaming Operation shall determine the minimum and maximum wagers at each table. The amounts of the minimum and maximum wagers shall be conspicuously posted

on a sign at each table.

25. Multiple Action Blackjack

(a) Definitions. The following words and terms, when used in this section, shall have the following meanings unless the context clearly indicates otherwise.

(1) "Blackjack" or "natural blackjack" shall mean an Ace and any card having a point value of 10 dealt as the initial

two cards to a player or a Dealer except that this shall not include an Ace and a ten point value card dealt to a player who has split pairs in a manner consistent with the rules of this section.

- (2) "Dealer" shall mean the gaming employee responsible for dealing the cards at a Multiple Action Blackjack table.
- (3) "Hard Total" shall mean the total point count of a Hand which contains no Aces or which contains Aces that are each counted as 1 in value.
- (4) "Soft Total" shall mean the total point count of a Hand containing an Ace when the Ace is counted as 11 in value.

(b) Equipment

- (1) Table. Multiple Action Blackjack shall be played at a table having on one side places for the players and on the opposite side a place for the Dealer. Each Multiple Action Blackjack table shall have a Drop Box and a tip box attached to the Dealer's side of the gaming table in a location approved in writing by the SGA and the SGO.
- (2) Layout. The Layout for a Multiple Action Blackjack table shall be approved in writing by the SGA and the SGO and shall contain, at a minimum:
 - a. The name or logo of the Nation Gaming Operation; and
 - b. Specific areas designated for the placement of

wagers, which betting areas shall not exceed three per player and places for up to seven players.

c. The following inscriptions:

1. Blackjack pays 3 to 2.
2. Dealer must draw to 16 and stand on all 17's; and
3. Insurance pays 2 to 1.

(3) card reader device. A Multiple Action Blackjack table may have attached to it, as approved in writing by the SGA and the SGO, a card reader device which permits the Dealer to read his or her hole card in order to determine if the Dealer has a blackjack. If a Multiple Action Blackjack table has an approved card reader device attached to it, the floorperson assigned to the table shall inspect the card reader device at the beginning of each gaming day. The purpose of this inspection shall be to insure that there has been no tampering with the device and that it is in proper working order.

(4) Discard rack. In order to collect the cards at the conclusion of a round of play and at such other times as provided in the Compact or its Appendices, each Multiple Action Blackjack table shall have a discard rack securely attached to the top of the Dealer's side of the table. The height of each discard rack shall equal the height of the cards, stacked one on top of the other, contained in the total number of decks that are to be used in the

dealing shoe at that table; provided, however, that a taller discard rack may be used if such rack has a distinct and clearly visible mark on its side to show the exact height for a stack of cards equal to the total number of cards contained in the number of decks to be used in the dealing shoe at that table.

- (5) Automated card shuffling device (Optional). An automated card shuffling device is a device which can automatically perform a Shuffle. Such a device shall meet the requirements of Appendix B, Section 71.

(c) Cards, Number of Decks, Value of Cards.

- (1) Multiple Action Blackjack shall be played with at least one deck of cards each which will meet the standards of Appendix B Section 69 with backs of the same color and design and one or more additional cutting cards.
- (2) The value of the cards contained in the each deck shall be as follows.
 - a. Any card from two to ten shall have its face value.
 - b. Any Jack, Queen, or King shall have its face value.
 - c. Any Ace shall have a value of 11 unless that would give the player or the Dealer a score in excess of 21, in which case it shall have a value of 1.

(d) Wagers

- (1) Prior to the first card being dealt, each player at the game of Multiple Action Blackjack shall make a minimum of two (2) wagers in circle one and two, and may opt to place a third wager in circle three within the posted minimums and maximums in succession against the Dealer which shall win if:
 - a. If at the completion of a round of play, the score of the player is 21 or less and the score of the Dealer is in excess of 21;
 - b. If at the completion of a round of play the score of the player exceeds that of the Dealer without either exceeding 21, or;
 - c. The player has achieved a score of 21 in two cards and the Dealer has achieved a score of 21 in more than two cards.
- (2) Except as otherwise provided in paragraph (d) (1)b. of this section, a wager made in accordance with this subsection shall be void when the score of the player is the same as the Dealer, provided however, that a player's wager shall lose when the Dealer has a Blackjack and the player has a simple 21 which is not a Blackjack.
- (3) Except as otherwise provided in these regulations, no wagers shall be made, increased, or withdrawn after the first card of the respective round has been dealt.
- (4) All wagers at Blackjack shall be made by placing gaming chips or plaques and if applicable, Match Play Coupons on

the appropriate areas of the Blackjack Layout, except that oral wagers accompanied by cash may be accepted, provided that they are confirmed by the Dealer and Supervisor and that such cash is expeditiously converted into gaming chips or plaques in accordance with the regulations governing the acceptance and conversion of such instruments.

- (5) The Nation Gaming Operation shall submit to the SGA for written approval, the minimum wagers permitted at each Multiple Action Blackjack table in the Nation Gaming Operation. The minimum and maximum wagers as established by the Nation Gaming Operation shall be and remain conspicuously posted on a sign at each table.
- (6) All winning wagers made in accordance with subsection (1) of this section shall be paid at odds of 1 to 1 with the exception of Blackjack, which shall be paid at odds of three to two.
- (7) Once the first card of any Hand has been removed from the shoe by the Dealer, no player shall handle, remove or alter any wager that has been made until a decision has been rendered and implemented with respect to that wager except as explicitly permitted by these regulations.
- (8) Once a wager on the insurance line, a wager to double down, or a wager to split pairs has been made and confirmed by the Dealer, no player shall handle, remove, or alter such a wager until a decision has been rendered and implemented with respect to that wager except as explicitly permitted by these regulations.

- (9) The Nation Gaming Operation may implement any of the following options at a Multiple Action Blackjack table:
- a. Persons who have not made a wager on the first round of play may not enter the game on a subsequent round of play until a reshuffle of the cards has occurred;
 - b. Persons who have not made a wager on the first round of play may be permitted to enter the game, but may be limited to wagering only the minimum limit posted at the table until a reshuffle of the cards has occurred;
 - c. Persons who, after making a wager on a given round of play, decline to wager on any subsequent round of play may be precluded from placing any further wagers until a reshuffle of the cards has occurred; and
 - d. Persons who, after making a wager on a given round of play, decline to wager on any subsequent round of play may be permitted to place further wagers, but may be limited to wagering only the minimum limit posted at the table until a reshuffle of the cards has occurred.
- (10) If the Nation Gaming Operation implements any of the options in paragraph (d) (9) above, the option shall be uniformly applied to all persons at that table; provided, however that if the Nation Gaming Operation has implemented either of the options in subparagraphs

(d) (9)c or (d) (9)d above, an exception may be made for a person who temporarily leaves the table if, at the time the person leaves, the Nation Gaming Operation agrees to reserve the person's spot until his or her return.

(e) Opening of Table for Gaming.

- (1) After receiving one or more decks at the table, the Dealer shall sort and inspect the cards and the floorperson assigned to the table shall verify the inspection.
- (2) After the cards are inspected the cards shall be spread out face upwards on the table for visual inspection by the first player or players to arrive at the table. The cards shall be spread out in horizontal fan shaped columns by deck according to suit and in sequence. The cards in each suit shall be laid out in sequence within the suit.
- (3) After the first player or players is afforded an opportunity to visually inspect the cards, the cards shall be turned face downwards on the table, mixed thoroughly by a "Washing" or "chermmy" Shuffle of the cards and stacked.

(f) Shuffle and Cut of the Cards.

- (1) Immediately prior to commencement of play, after any round of play as may be determined by the Nation Gaming Operation and after each shoe of cards is dealt, the Dealer shall Shuffle the cards so that they are randomly

intermixed.

- (2) After the cards have been Shuffled the Dealer shall offer the stack of cards, with backs facing away from the Dealer, to the players to be cut.
- (3) The player designated by subsection (6) of this section shall cut the cards by placing the cutting card in the stack at least 10 cards in from either end.
- (4) Once the cutting card has been inserted by the player, the Dealer shall take all the cards in front of the cutting card and place them on the back of the stack, after which the Dealer shall insert the cutting card in a position at least approximately one quarter of the way in from the back of the stack. The stack of cards shall then be inserted into the dealing shoe for the commencement of play.
- (5) If an automated shuffling device is utilized, all of the decks in one batch of cards shall be spread for inspection on the table separately from the decks in the other batch of cards. After the player (s) is afforded an opportunity to visually inspect the cards, each batch of cards shall separately be turned face downward on the table, washed and stacked.
- (6) The player to cut the cards shall be.
 - a. The first player to the table if the game is just beginning.

- b. The player on whose box the cutting card appeared during the last round of play.
 - c. The player at the farthest point to the right of the Dealer if the cutting card appeared on the Dealer's Hand during the last round of play.
 - d. The player at the farthest point to the right of the Dealer if the reshuffle was initiated at the discretion of the Nation Gaming Operation.
- (7) If the player designated in subsection (6) above refused the cut, the cards shall be offered to each other player moving clockwise around the table until a player accepts the cut. If no player accepts the cut, the Dealer shall cut the cards.
- (8) A reshuffle of the cards in the shoe shall take place after the cutting card is reached as provided in the Blackjack rules in Appendix A, Section 5, except that the Nation Gaming Operation may determine after each round that the cards should be reshuffled.
- (9) The Nation Gaming Operation may submit to the SGA for approval in writing the proposed Shuffle, cut card placement, number of cut cards (to include Shuffle techniques without the use of any cut cards), location of where the Shuffle takes place, who is responsible for shuffling, shuffling equipment (dealing shoes or other devices) and burn card procedures.
- (g) Procedure for dealing Cards.

- (1) All cards used at the game of Multiple Action Blackjack shall be dealt from a dealing shoe meeting the requirements of Appendix B, Section 71, and located on the table to the left of the Dealer.
- (2) Each Dealer shall remove cards from the shoe with their left hand, turn them face upwards, and then place them on the appropriate area of the Layout with the right hand, except that the Dealer has the option to deal hit cards to the first three positions with the left hand.
- (3) After each full set of cards is placed in the shoe, the Dealer shall remove the first card face downwards and place it in the discard rack which shall be located on the table immediately to the right of the Dealer. Each new Dealer who comes to the table shall also burn one card as described herein before the new Dealer deals any cards to the players. The burn card shall be disclosed to all players if requested. Cards will be delivered as follows.
 - a. One card face upwards to each box on the Layout in which a wager is contained;
 - b. One card face upwards to the Dealer;
 - c. A second card face upwards to each box in which a wager is contained.
- (4) After two cards have been dealt to each player and the appropriate number to the Dealer, the Dealer shall, beginning from the left, announce the point total of each

player. As each player's point total is announced such player shall indicate whether they wish to double down, split pairs, stand, draw and/or make an insurance wager, as provided for by this section.

- (5) As each player indicates his or her decision(s), the Dealer shall deal face upwards whatever additional cards are necessary to effectuate such decision consistent with these regulations, and shall announce the new point total to each player after each additional card is dealt.
- (6) A player whose point total exceeds 21 shall lose all three wagers and their cards shall be collected by the Dealer.
- (7) If a hole card is used, the Nation Gaming Operation shall permit a Multiple Action Blackjack Dealer to deal the Dealer's hole card face downward after a second card and before additional cards are dealt to the players, provided that the Dealer not look at the face of the hole card until after all other cards requested by the players are dealt to them.
- (8) At the conclusion of the first round of play, the Dealer shall pay or collect only the first round wagers starting with the players to the Dealer's far right and moving counter clockwise around the table. The Dealer shall then remove all Dealer's cards to the right of the Dealer's original up card and place them in the discard rack.
- (9) A second round will then commence with the Dealer using the same face up card, and following the same procedures

for drawing additional cards, collecting losing wagers and paying winning wagers as warranted. The player's Hand shall remain unchanged for each round of play.

- (10) A third and final round shall be played following the same procedures as established in subsection (8) above.
- (11) At the conclusion of the third round of play, all cards remaining on the Layout shall be picked up by the Dealer in order and in such manner that they can be easily reconstructed in case of question or dispute. The Dealer shall pick up the cards of the player to his or her far right and moving counter clockwise around the table. After all of the player's cards are collected, the Dealer shall pick up his or her cards, position them against the bottom of the player's cards and place them in the discard rack.
- (12) Whenever the cutting card is reached in the deal of the cards, the Dealer shall continue dealing the cards until that round of play is completed and then reshuffle the cards.
- (13) No player or spectator shall handle, remove or alter any card used in the game of Multiple Action Blackjack except as explicitly permitted.
- (14) Each player at the table shall be responsible for correctly computing the point count of his or her Hand, and no player shall rely on the point counts announced by the Dealer.

(h) Payment of Blackjack.

- (1) If the first face up card dealt to the Dealer is a 2, 3, 4, 5, 6, 7, 8, or 9, and a player has Blackjack, the Dealer shall announce and pay the Blackjack at odds of 3 to 2 for all player wagers and shall remove the player's cards before any player receives a third card. If the Nation Gaming Operation elects to utilize a card reader device, the Dealer shall insert the hole card into the card reader device by moving the card face down on the Layout without exposing its value to anyone at the table, including the Dealer. If the Dealer has a natural Blackjack, no additional cards shall be dealt and each player's wager shall be settled.
- (2) If the first face up card dealt to the Dealer is an Ace, King, Queen, Jack or Ten and a player has Blackjack, the Dealer shall announce the Blackjack but shall make no payment nor remove any card until all other cards are dealt to the players and the Dealer receives the Dealer's second card. If, in such circumstances, the Dealer's second card does not give the Dealer Blackjack, the player having Blackjack shall be paid at odds of 3 to 2. In each round of play, if the Dealer's second card results in a Dealer Blackjack, the wager of the player(s) having Blackjack shall constitute a push.

(i) Insurance wagers.

- (1) Whenever the first card dealt to the Dealer is an Ace, each player shall have the right to place an insurance bet directly alongside of their wager for that round of

play. The insurance amount shall not exceed one half of the player's wager for that round of play, except that a player may bet an amount in excess of half the initial wager to the next unit that can be wagered in chips when, because of the limitation of the value of chip denominations, half the initial wager cannot bet. This bet shall win if on that round of play the Dealer's second card is a King, Queen, Jack, or Ten and shall lose if the Dealer's second card is an Ace, 2, 3, 4, 5, 6, 7, 8, or 9. All insurance wagers shall be placed prior to the Dealer inserting his or her hole card into the card reader device or otherwise determining whether the Dealer's hole card is a King, Queen, Jack or 10.

- (2) An insurance wager may be placed in each subsequent round in accordance with the provisions of (1) above.

- (8) Each winning insurance wager shall be paid at odds of 2 to 1. Each losing wager shall be collected before continuing play.

(j) Doubling Down.

- (1) A player may elect to double down on any two cards; i.e. make an additional wager not in excess of the amount of his or her original wager, on the first two cards dealt to him or her or the first two cards of any split pair on the condition that one and only one card shall be dealt to the Hand on which he or she has elected to double down. In such circumstances, the one additional card shall be dealt face upwards and placed sideways on the Layout perpendicular to the two cards forming the Hand on

which the player has elected to double down.

- (2) If a Dealer has a Blackjack after a player doubles down, the Dealer shall only collect the amount of the original wager for that round of play and shall not collect the double down wager for that round.

(k) Splitting Pairs.

- (1) Whenever the initial two cards dealt to a player are identical in value, the player may elect to split the Hand into two separate Hands, provided that he or she makes a wager on the second Hand so formed in an amount equal to the original wager.
- (2) When a player splits pairs, the Dealer shall deal a second card and complete the player's decisions with respect to the first incomplete Hand on the Dealer's left before proceeding to deal any card to the other Hand.
- (3) After a second card is dealt to a split pair, the Dealer shall announce the point total of such Hand and the player shall indicate his or her decision to stand, draw or double down with respect thereto except that;
 - a. A player may not split pairs again if the second card so dealt is identical in value to a card of the split pair;
and
 - b. A player splitting Aces shall only have one card dealt to each Ace and cannot be dealt additional cards.

- (4) If the Dealer obtains Blackjack after the player has split pairs, the Dealer shall only collect the amount of the original wager and shall not collect the additional amount wagered in splitting pairs for each individual round of play.
- (l) Drawing of additional cards by players and Dealers for each round of play.
 - (1) A player may elect to draw additional cards whenever the player's point count is 21 or less except that:
 - a. A player electing to double down shall draw one and only one additional card.
 - b. A player splitting Aces shall only have one card dealt to each Ace and cannot be dealt additional cards.
 - (2) Except as provided in (3) below, a Dealer shall draw additional cards to the Dealer's Hand until the Dealer has a total of soft or hard 17, or has a soft or hard total of 18, 19, 20, or 21, at which point no additional cards shall be drawn. This rule applies for each round of play.
 - (3) A Dealer shall draw no additional cards to the Dealer's Hand, regardless of the point count, if decisions have been made on all player's Hands and the point count of the Dealer's Hand will have no effect on the outcome of the round of play.

- (m) The Nation Gaming Operation may implement any of the following options at Multiple Action Blackjack table:
- (1) Persons who have not made a wager on the first round of play may not enter the game on a subsequent round of play until a reshuffle of the cards has occurred;
 - (2) Persons who have not made a wager on the first round of play may be permitted to enter the game, but may be limited to wagering only the minimum limit posted at the table until a reshuffle of the cards has occurred;
 - (3) Persons who, after making a wager on a given round of play, decline to wager on any subsequent round of play may be precluded from placing any further wagers until a reshuffle of the cards has occurred; and
 - (4) Persons who, after making a wager on a given round of play, decline to wager on any subsequent round of play may be permitted to place further wagers, but may be limited to wagering only the minimum limit posted at the table until a reshuffle of the cards has occurred.
 - (5) If the Nation Gaming Operation implements any of the options above, the option shall be uniformly applied to all persons at that table; provided, however that if the Nation Gaming Operation has implemented either of the options in subsections (3) or (4) above, an exception may be made for a person who temporarily leaves the table if, at the time the person leaves, the Nation Gaming Operation agrees to reserve the person's spot until his or her return.

(n) Irregularities.

- (1) A card found face upwards in the shoe shall not be used in the round and shall be burned and placed in the discard rack.
- (2) A card drawn in error without its face being exposed shall be used as though it were the next card from the shoe.
- (3) If after the initial two cards have been dealt to each player and a card is drawn in error and exposed to the players, such card shall be dealt to the players or Dealer as though it were the next card from the shoe. Any player refusing to accept such card shall not have any additional cards dealt to them during the round. If the card is refused by the player and the Dealer cannot use the card, the card will be burned and placed in the discard rack.
- (4) If the Dealer has seventeen or more, but less than 21, and accidentally draws a card for himself or herself, such card shall be burned.
- (5) If the Dealer fails to deal himself or herself a first card, the Dealer shall continue dealing the first two cards to each player, and then deal the appropriate number of cards to himself or herself.
- (6) If there are insufficient cards remaining in the shoe to complete a round of play, all of the cards in the discard rack shall be Shuffled and cut in accordance with (f)

above. The first card will be drawn face downwards, burned and the Dealer will complete the round of play and continue with the next round.

(7) If no cards are dealt to the player's Hand, the Hand shall be declared dead and the player shall be included in the next deal. If only one card is dealt to a player's Hand, at the player's option, the Dealer shall deal the second card to the player after all other players have received a second card.

(8) If after receiving the first two cards, the Dealer fails to deal an additional card(s) to a player who has requested such card, then at the player's option, the Dealer will either deal the additional card(s) after all other players have received their additional cards but prior to the Dealer revealing his or her hole card, or call the player's Hand dead, return the player's original wager and burn the player's cards by placing them in the discard rack or in a segregated area of the double shoe.

(o) Card Reader Irregularities.

(1) If the Dealer neglects to properly check his or her hole card, the play will continue as if a card reader is not in use.

(2) If the Dealer exposes his or her hole card in error, the floor Supervisor shall be called. The floor Supervisor will then instruct the Dealer to turn the card back over, place it underneath the up card and continue play

- (3) If the card reader device is not operating, play will continue as if a card reader is not in use.
- (4) If upon exposing the hole card it becomes apparent that the Dealer incorrectly placed the card into the card reader, causing the hole card to be misread, the floor Supervisor shall be called. The Dealer shall be instructed to replace the hole card under the top card as if it had not been exposed and continue play.

(p) Minimum wagers and maximum wagers

The Nation Gaming Operation shall determine the minimum and maximum wagers at each table. The amounts of the minimum and maximum wagers shall be conspicuously posted on a sign at each table.

26. Three Card Poker

(a) Definitions

The following words and terms, when used in this subchapter, shall have the following meanings unless the context clearly indicates otherwise:

- (1) "Ante wager" means the wager that a player is required to make prior to any cards being dealt in order to compete against the Dealer's Hand in a round of play.
- (2) "Hand" means the three-card poker Hand that is held by each player and the Dealer after the cards are dealt.
- (3) "Pair plus wager" means the wager that a player is required to make prior to any cards being dealt in order to compete against a posted scale of Payouts, regardless of the outcome of the player's Hand against the Dealer.
- (4) "Play wager" means an additional wager, equal in value to his or her ante wager, that a player must make if the player opts to remain in competition against the Dealer after the player reviews his or her Hands.
- (5) "Round of play" means one complete cycle of play during which all wagers have been placed, all cards have been dealt and all remaining wagers have been paid off or collected in accordance with these rules.
- (6) "Stub" means the remaining portion of the deck after all cards in the round of play have been dealt or delivered.

(7) "Suit" means one of the four categories of cards: club, diamond, heart or spade.

(b) Three card poker table; physical characteristics

(1) Three-card poker shall be played at a table having betting positions for the players on one side of the table and a place for the Dealer on the opposite side. Such betting positions shall not exceed nine in number depending on the size of the table.

(2) The Layout for a three card poker table shall be approved in writing by the SGA and the SGO and shall contain, at a minimum:

- a. The Logo of the Nation Gaming Operation;
- b. A separate designated betting area at each betting position for the placement of "ante" wagers;
- c. A separate designated betting area located immediately in front of each ante wager betting area for the placement of "play" wagers;
- d. A separate designated betting area located immediately behind each ante wager betting area for the placement of "pair plus" wagers; and
- e. Inscriptions that advise patrons, in accordance with subsection (1) and as approved by the SGA in writing, the Payout odds for ante and play wagers,

pair plus wagers and ante bonuses and that "Dealer Plays with Queen High or Better".

- (3) Each three-card poker table shall have a Drop Box and a tip box attached to it on the same side of the gaming table as, but on opposite sides of, the Dealer, and in locations approved by the SGA and the SGO in writing.
- (4) In order to collect the cards at the conclusion of a round of play and at such other times as provided in the Compact or its Appendices, each three card poker table shall have a discard rack securely attached to the top of the Dealer's side of the table. The height of each discard rack shall equal the height of the cards, stacked one on top of the other, contained in the total number of decks that are to be used in the dealing shoe at that table. Notwithstanding, the foregoing, a taller discard rack may be used if such rack has a distinct and clearly visible mark on its side to show the exact height for a stack of cards equal to the total number of cards contained in the number of decks to be used in the dealing shoe at that table.

(c) Cards; number of decks

- (1) Except as provided in (2) below, three card poker shall be played with one deck of cards with backs of the same color and design and one additional cover card to be used in accordance with the procedures set forth in subsection (f). The cover card shall be opaque and in a solid color readily distinguishable from the color of the backs and edges of the playing cards, as approved by the SGA and

the SGO in writing. The deck of cards shall meet the requirements of Appendix B Section 69.

- (2) If an automated card shuffling device is used, The Nation Gaming Operation shall be permitted to use a second deck of cards to play the game, provided that:
 - a. Each deck of cards complies with the requirements of (1) above;
 - b. The backs of the cards in the two decks are of different color;
 - c. One deck is being Shuffled by the automated card shuffling device while the other deck is being dealt or used to play the game;
 - d. Both decks are continuously alternated in and out of play, with each deck being used for every other round of play; and
 - e. The cards from only one deck shall be placed in the discard rack at any given time.

(d) Three card poker rankings

- (1) The rank of the cards used in three card poker, in order of highest to lowest rank, shall be: ace, king, queen, jack, 10, 9, 8, 7, 6, 5, 4, 3 and 2. All suits shall be considered equal in rank. Notwithstanding the foregoing, an ace may be used to complete a "straight flush" or a "straight" with a two and three.

- (2) The permissible poker Hands in the game of three card poker, in order of highest to lowest rank, shall be:
- a. "Straight flush" is a Hand consisting of three cards of the same suit in consecutive ranking, with ace, king and queen being the highest straight flush and three, two and ace being the lowest ranking straight flush.
 - b. "Three-of-a-kind" is a Hand consisting of three cards of the same rank, regardless of suit, with three aces being the highest ranking three-of-a-kind and three twos being the lowest ranking three-of-a-kind.
 - c. "Straight" is a Hand consisting of three cards of consecutive rank, regardless of suit, with ace, king and queen being the highest ranking straight and three, two and ace being the lowest ranking straight.
 - d. "Flush" is a Hand consisting of three cards of the same suit, regardless of rank.
 - e. "Pair" is a Hand consisting of two cards of the same rank, regardless of suit, with two aces being the highest ranking pair and two twos being the lowest ranking pair.
- (3) When comparing two Hands that are of identical poker Hand rank pursuant to the provisions of (2) above, or that

contain none of the Hands authorized in (2) above, the Hand that contains the highest ranking card as provided in (1) above that is not contained in the other Hand shall be considered the higher ranking Hand. If the Hands are of identical rank after the application of this subsection, the Hands shall be considered a draw.

(e) Opening of the table for gaming

- (1) After receiving a deck of cards at the table in accordance with Appendix B Section 70, the Dealer shall sort and inspect the cards, and the floorperson assigned to the table shall verify that inspection.
- (2) Following the inspection of the cards by the Dealer and the verification by the floorperson assigned to the table, the cards shall be spread out face up on the table for visual inspection by the first player to arrive at the table. The cards shall be spread out according to suit and in sequence.
- (3) After the first player has been afforded an opportunity to visually inspect the cards, the cards shall be turned face down on the table, mixed thoroughly by a "Washing" or "Chemmy Shuffle" of the cards and stacked. Once the cards have been stacked, they shall be Shuffled in accordance with subsection (f).
- (4) If The Nation Gaming Operation uses an automated card shuffling device to play the game and two decks of cards are received at the table pursuant to Appendix B Section 70 and subsection (c), each deck of cards shall be

separately sorted, inspected, verified, spread, inspected, mixed, stacked and Shuffled in accordance with the provisions of (1) through (3) above.

- (5) All cards opened for use on a table and dealt from a manual or automated dealing shoe shall be changed at least once every eight hours. All cards opened for use on a table and dealt from the Hand shall be changed at least every four hours. Procedures for compliance with this section shall be submitted to the SGA for approval in writing.

(f) Shuffle and cut of the cards

- (1) Immediately prior to the commencement of play and after each round of play has been completed, the Dealer shall Shuffle the cards, either manually or by use of an automated card shuffling device, so that the cards are randomly intermixed. Upon completion of the Shuffle, the Dealer or device shall place the deck of cards in a single stack; provided, however, that nothing in this section shall be deemed to prohibit the use of an automated card shuffling device which, upon completion of the shuffling of the cards, inserts the stack of cards directly into a dealing shoe.
- (2) After the cards have been Shuffled and stacked, the Dealer shall:
 - a. If the cards were Shuffled using an automated card shuffling device, deal or deliver the cards in accordance with the procedures set forth in (h),

- (i) or (j) ; or
 - b. If the cards were Shuffled manually, cut the cards in accordance with the procedures set forth in (3) below.
- (3) If a cut of the cards is required, the Dealer shall:
- a. Cut the deck, using one Hand, by:
 - i. Placing the cover card on the table in front of the deck of cards;
 - ii. Taking a stack of at least 10 cards from the top of the deck and placing them on top of the cover card;
 - iii. Placing the cards remaining in the deck on top of the stack of cards that were cut and placed on the cover card pursuant to (3)a.ii above; and
 - iv. Removing the cover card and placing it in the discard rack; and
 - b. Deal the cards in accordance with the procedures set forth in (h), (i) or (j).
- (4) Notwithstanding (3) above, after the cards have been cut and before any cards have been dealt, a Gaming Facility Supervisor may require the cards to be re-cut if he or she determines that the cut was performed improperly or

in any way that might affect the integrity or fairness of the game.

- (5) Whenever there is no gaming activity at a three card poker table which is open for gaming, the cards shall be spread out on the table either face up or face down. If the cards are spread face down, they shall be turned face up once a player arrives at the table. After the first player is afforded an opportunity to visually inspect the cards, the procedures outlined in (e) (3) shall be completed.

(g) Wagers

- (1) The following wagers may be placed in the game of three card poker:
- a. A player may compete solely against the Dealer by placing an ante wager in an amount within the posted minimum and maximum wagers and then placing a play wager in an equal amount;
 - b. A player may compete solely against a posted Payout ledger by placing a pair plus wager, which wager may be in any amount within the posted minimum and maximum wagers; or
 - c. A player may compete against both the Dealer and the posted Payout ledger by placing wagers in accordance with the requirements of (l)a. and b. above.

- (2) All wagers at three card poker shall be made by placing gaming chips or plaques and, if applicable, a Match Play Coupon on the appropriate betting areas of the table Layout. An oral wager accompanied by cash shall not be accepted.
- (3) Only players who are seated at a three-card poker table may wager at the game. Once a player has placed a wager and received cards, that player shall remain seated until the completion of the round of play.
- (4) All ante wagers and pair plus wagers shall be placed prior to the Dealer announcing "No more bets" in accordance with the dealing procedures in (h), (i) or (j). No wager shall be made, increased or withdrawn after the Dealer has announced "No more bets." All play wagers shall be placed in accordance with (k) (2).
- (5) The Nation Gaming Operation may, in its discretion, permit a player to place wagers at two betting positions during a round of play provided that the two betting positions are adjacent to each other.
- (6) Notwithstanding (1) above, The Nation Gaming Operation may offer a version of the game of three card poker requiring:
 - a. As a precondition to the placement of a pair plus wager, the placement of an ante wager in an amount at least equal to the pair plus wager;
 - b. As a precondition to the placement of a pair plus

wager, the placement of an ante wager in an amount at least equal to one-half the pair plus wager; or

- c. The compulsory placement of an ante wager and a pair plus wager, provided that one wager may be placed in an amount up to a maximum of five times the amount of the other wager without regard to which wager is the greater of the two.

(h) Procedures for dealing the cards from a manual dealing shoe

- (1) If The Nation Gaming Operation chooses to have the cards dealt from a manual dealing shoe, the dealing shoe shall be located on the table in a location to the left of the Dealer. Once the procedures required by (f) have been completed, the stacked deck of cards shall be placed in the dealing shoe either by the Dealer or by an automated card-shuffling device.
- (2) The Dealer shall announce "No more bets" prior to dealing any cards. Each card shall be removed from the dealing shoe with the Hand of the Dealer that is closest to the dealing shoe and placed on the appropriate area of the Layout with the opposite Hand.
- (3) The Dealer shall, starting with the player farthest to his or her left and continuing around the table in a clockwise manner, deal one card at a time in order to each player who has placed an ante wager or pair plus wager and to the Dealer until each player who placed a wager and the Dealer each has three cards. All cards shall be dealt face down.

- (4) After three cards have been dealt to each player and the Dealer, the Dealer shall remove the Stub from the manual dealing shoe and, except as provided in (5) below, place the Stub in the discard rack without exposing the cards.

- (5) The Dealer shall be required to count the Stub at least once every five rounds of play in order to determine that the correct number of cards are still present in the deck. The Dealer shall determine the number of cards in the Stub by counting the cards face down on the Layout.
 - a. If the count of the Stub indicates that 52 cards are in the deck, the Dealer shall place the Stub in the discard rack without exposing the cards.

 - b. If the count of the Stub indicates that the number of cards in the deck is incorrect, the Dealer shall determine if the cards were misdealt. If the cards have been misdealt (a player or the Dealer has more or less than three cards) but 52 cards remain in the deck, all Hands shall be void pursuant to (1) below. If the cards have not been misdealt, all Hands shall be considered void and the entire deck of cards shall be removed from the table according to procedures in Appendix B Section 70.

- (6) Notwithstanding the provisions of (5) above, the counting of the Stub shall not be required if an automated card shuffling device is used that counts the number of cards in the deck after the completion of each Shuffle and indicates whether 52 cards are still present. If the

automated card shuffling device reveals that an incorrect number of cards are present, the deck shall be removed from the table according to procedures in Appendix B Section 70.

(i) Procedures for dealing the cards from the Hand

- (1) The Nation Gaming Operation may, in its discretion, permit a Dealer to deal the cards used to play three-card poker from his or her Hand.
- (2) If The Nation Gaming Operation chooses to have the cards dealt from the Dealer's Hand, the following requirements shall be observed:
 - a. The Nation Gaming Operation shall use an automated shuffling device to Shuffle the cards.
 - b. Once the procedures required by (f) have been completed, the Dealer shall place the stacked deck of cards in either Hand.
 - i. Once the Dealer has chosen the Hand in which he or she will hold the cards, the Dealer shall use that Hand whenever holding the cards during that round of play.
 - ii. The cards held by the Dealer shall at all times be kept in front of the Dealer and over the table inventory container.
 - c. The Dealer shall then announce "No more bets" prior

to dealing any cards. The Dealer shall deal each card by holding the deck of cards in the chosen Hand and using the other Hand to remove the top card of the deck and place it face down on the appropriate area of the Layout.

- (3) The Dealer shall, starting with the player farthest to his or her left and continuing round the table in a clockwise manner, deal one card at a time in order to each player who has placed an ante wager or pair plus wager and to the Dealer until each player who placed a wager and the Dealer each has three cards. All cards shall be dealt face down.
 - (4) After three cards have been dealt to each player and the Dealer, the Dealer shall, except as provided in (5) below, place the Stub in the discard rack without exposing the cards.
 - (5) The Dealer shall be required to count the Stub at least once every five rounds of play in order to determine that the correct number of cards are still present in the deck. The Dealer shall count the Stub in accordance with the provisions of (h) (5) and (6).
- (j) Procedures for dealing the cards from an automated dealing shoe
- (1) The Nation Gaming Operation may, in its discretion, choose to have the cards used to play three card poker dealt from an automated dealing shoe which dispenses cards in stacks of three cards, provided that the shoe,

its location and the procedures for its use are approved by the SGA in writing.

- (2) If The Nation Gaming Operation chooses to have the cards dealt from an automated dealing shoe, the following requirements shall be observed:
 - a. Once the procedures required by (f) have been completed, the cards shall be placed in the automated dealing shoe.
 - b. The Dealer shall then announce "No more bets" prior to the shoe dispensing any stacks of cards.
- (3) The Dealer shall deliver the first stack of cards dispensed by the automated dealing shoe face down to the player farthest to his or her left who has placed a wager in accordance with (g). As the remaining stacks are dispensed to the Dealer by the automated dealing shoe, the Dealer shall, moving clockwise around the table, deliver a stack face down to each of the other players who has placed a wager in accordance with (g). The Dealer shall then deliver a stack of three cards face down to the area designated for the placement of the Dealer's cards.
- (4) After each stack of three cards has been dispensed and delivered in accordance with this subsection, the Dealer shall remove the Stub from the automated dealing shoe and, except as provided in (5) below, place the cards in the discard rack without exposing the cards.

- (5) The Dealer shall be required to count the Stub at least once every five rounds of play in order to determine that the correct number of cards are still present in the deck. The Dealer shall count the Stub in accordance with the provisions of (h) (5) and (6).

(k) Procedures for completion of each round of play

- (1) After the dealing procedures required by (h), (i) or (j) have been completed, each player shall examine his or her cards. Each player who wagers at three card poker shall be responsible for his or her own Hand and no person other than the Dealer and the player to whom the cards were dealt may touch the cards of that player.
- (2) After examination of his or her cards, each player who has placed an ante wager shall have the option to either make a play wager in an amount equal to the player's ante wager or forfeit the ante wager and end his or her participation in the round of play. The Dealer shall offer this option to each player, starting with the player farthest to the left of the Dealer and moving clockwise around the table in order. If a player has placed an ante wager and a pair plus wager but does not make a play wager, the player shall forfeit both the ante wager and the pair plus wager. After each player has either placed a wager on the table in the play wager area or forfeited his or her wager and Hand, the Dealer shall collect all forfeited wagers and associated cards, placing the cards in the discard rack. The Dealer shall then reveal the Dealer's cards and place the cards so as to form the highest possible ranking Hand. The Dealer

shall then, starting with the player farthest to the Dealer's right whose Hand is still active, reveal the three-card Hand of each player.

- (3) After all losing wagers have been collected, all winning wagers shall be paid. All winning Hands shall remain face up on the Layout until all winning wagers have been paid by the Dealer. Each winning wager that remains on the table shall be paid in accordance with the Payout odds listed in (1).
 - a. The Dealer shall pay all winning wagers beginning with the player farthest to the right of the Dealer and continuing counterclockwise around the table.
 - b. After paying all winning wagers, the Dealer shall immediately collect the cards of all players and the Dealer and place them in the discard rack.
- (4) All cards collected by the Dealer shall be picked up in order and placed in the discard rack in such a way that they can be readily arranged to reconstruct each Hand in the event of a question or dispute.

(1) Payout odds

- (1) There are three Payout types as follows:
 - a. A player in competition against the Dealer shall be paid 1 to 1 on both the ante wager and the play wager if the player's Hand is ranked higher than the Dealer's Hand. Notwithstanding the foregoing,

if the Dealer does not hold a Hand with a "queen high or better" rank, the ante wager shall automatically be paid 1 to 1 and the play wager shall be returned to the player.

- b. A player placing a pair plus wager shall be paid in accordance with the following Payout ledger:

Pair	pays	1 to 1
Flush	pays	4 to 1
Straight Three-of-a-kind	pays	6 to 1
Straight	pays	30 to 1
flush	pays	40 to 1

- i. In the alternative, The Nation Gaming Operation shall have the discretion to pay a pair plus wager in accordance with the following Payout ledger:

Pair	pays	1 to 1
Flush	pays	4 to 1
Straight Three-of-a-kind	pays	6 to 1
Straight	pays	33 to 1
flush	pays	35 to 1

- c. A player placing an ante wager and a play wager shall be paid a bonus if the player's Hand consists of the following:

Straight Three-of-a-kind	pays	1 to 1
Straight	pays	4 to 1
flush	pays	5 to 1

- i. In the event that a The Nation Gaming Operation offers a version of three card poker that offers pair plus Payout odds in accordance with (l)b.i above, a player placing an ante wager and play wager may be paid an ante bonus if the player's Hand consists of the following:

Straight	pays	1 to 1
Three-of-a-kind	pays	5 to 1
Straight flush	pays	6 to 1

(m) Irregularities

- (1) A card that is found face up in the shoe or the deck while the cards are being dealt shall not be used in the game and shall be placed in the discard rack. If more than one card is found face up in the shoe or the deck during the dealing of the cards, all Hands shall be void and the cards shall be reshuffled.
- (2) A card drawn in error without its face being exposed shall be used as though it was the next card from the shoe or the deck.
- (3) If any player or the Dealer is dealt an incorrect number of cards, all Hands shall be void and the cards shall be reshuffled.
- (4) If one or more of the Dealer's cards is inadvertently exposed prior to the Dealer revealing his or her cards as

prescribed in (k) (2), all Hands shall be void and the cards shall be reshuffled.

- (5) If an automated card-shuffling device is being used and the device jams, stops shuffling during a Shuffle, or fails to complete a Shuffle cycle, the cards shall be reshuffled in accordance with procedures approved by the SGA in writing.
 - (6) If an automated dealing shoe is being used and the device jams, stops dealing cards, or fails to deal all cards during a round of play, the round of play shall be void and the cards shall be removed from the device and reshuffled with any cards already dealt, in accordance with procedures approved by the SGA in writing.
 - (7) Any automated card shuffling device or automated dealing shoe shall be removed from a gaming table before any other method of shuffling or dealing may be utilized at that table.
- (n) Minimum wagers and maximum wagers.

The Nation Gaming Operation shall determine the minimum and maximum wagers at each table. The amounts of the minimum and maximum wagers shall be conspicuously posted on a sign at each table.

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NATION-STATE GAMING COMPACT
BETWEEN THE
SENECA NATION OF INDIANS
AND THE
STATE OF NEW YORK

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APPENDIX B : Standards of Operation and Management for
Class III Gaming

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1. Purpose, format, submission and amendment of the Nation Gaming Operation's System of Internal Controls

- (a) Purpose. The procedures of the System of Internal Controls are designed to ensure all of the following:
- (1) That assets of the Nation Gaming Operation are safeguarded.
 - (2) That the financial records of the Nation Gaming Operation are accurate and reliable.
 - (3) That the transactions of the Nation Gaming Operation are performed only in accordance with the specific or general authorization of this Appendix.
 - (4) That accountability for assets is maintained in accordance with generally accepted accounting principles.
 - (5) That only authorized personnel have access to assets.
 - (6) That recorded accountability for assets is compared with actual assets at reasonable intervals and appropriate action is taken with respect to any discrepancies.
 - (7) That the functions, duties, and responsibilities are appropriately segregated and performed in accordance with sound practices by competent, qualified personnel and that no employee of the Nation Gaming Operation is in a position to perpetuate and conceal errors or irregularities in the normal course of the employee's duties.
 - (8) That gaming is conducted with integrity and in accordance

with the Compact.

(b) The Nation Gaming Operation shall submit to the Seneca Gaming Authority ("SGA") with a copy to the State Gaming Officials ("SGO") a description of its system of internal procedures and administrative and accounting controls in accordance with this section. Such submission, which shall be consistent with the provisions of this Appendix, shall be submitted to the SGA with a copy to the SGO at least ninety (90) days prior to the expected date of commencement of gaming activities. The submission shall contain both narrative and diagrammatic representations of the Internal Control System to be utilized by the Nation Gaming Operation and shall include, without limitation, the following:

(1) Administrative controls which include, without limitation, the procedures and records that are concerned with the decision making processes leading to Gaming Facility's management's authorization of transactions;

(2) Accounting controls which have as their primary objectives the safeguarding of assets and the reliability of financial records and are consequently designed to provide reasonable assurance that:

a. Transactions are executed in accordance with management's general and specific authorization;

b. Transactions are recorded as necessary to permit preparation of Financial Statements in conformity with generally accepted accounting principles, and to maintain accountability for assets;

- c. Access to assets is permitted only in accordance with management authorization;
- d. The recorded accountability for assets is compared with existing assets at reasonable intervals and appropriate action is taken with respect to any differences;
- e. An organizational chart depicting appropriate segregation of functions and responsibilities; and
- f. A description of the duties and responsibilities of each position shown on the organizational chart.

(3) Procedures and controls for ensuring, through the use of the security department, that the Gaming Facility are constantly secure during normal operations and any emergencies due to malfunctioning equipment, loss of power, any natural disaster or any other cause.

(c) The SGA and the SGO shall review each submission required by subdivision (b) above shall determine whether it conforms to the requirements of the Compact and this Appendix and whether the system submitted provides adequate and effective controls for the operations of the Nation Gaming Operation. If the SGA and the SGO find any insufficiency, they shall specify such insufficiency in writing to the Nation Gaming Operation, which shall make timely appropriate alterations and forward such to the SGA and the SGO for written approval. When the SGA and the SGO determine a submission to be adequate in all respects, it shall so notify the Nation Gaming Operation in writing. The Nation Gaming Operation shall not commence gaming operations

unless and until its complete System of Internal Controls is approved in writing by the SGA and the SGO.

- (d) The Nation Gaming Operation shall submit to the SGA and the SGO any changes to its system of internal procedures and administrative and accounting controls previously determined by the SGA and the SGO in subdivision (c) above to be adequate in all respects, no less than sixty (60) days before the changes are to become effective, unless otherwise permitted in writing by the SGA and the SGO. The proposed changes may be approved or disapproved by the SGA and the SGO in writing consistent with the procedures contained in subdivision (c) above. The Nation Gaming Operation shall not alter its internal controls unless and until such changes are approved.
- (e) Any submission required by subdivisions (c) and (d) above shall be accompanied by a report of an Independent Certified Public Accountant licensed to practice in New York stating that the submitted system conforms in all respects to the standards of internal control set forth in the Compact and its Appendices or in what respects the system does not conform.
- (f) Procedures that are to be established pursuant to this Appendix shall be initially approved by both the SGA and the SGO in writing. Subsequent modifications to such procedures shall be submitted by the Nation Gaming Operation to the SGA for its approval in writing, with a copy to SGO. SGA shall approve such proposed modifications only if they do not substantially alter the conduct of the game or have an adverse effect on the integrity of the game. Modifications will not take effect unless approved by the SGA in writing. SGO may object within seven (7) days of receipt of notice of any proposed modification of

procedures established pursuant to this Appendix if it believes such modifications would substantially alter the conduct of the game or have an adverse effect on the integrity of the game in question. SGA shall stay approval of the proposed modification upon receipt of SGO' s written objection. SGA and SGO shall promptly meet to discuss such objection and seek mutual agreement on the proposed modification. If SGA and SGO are unable to reach agreement, either party may submit the question to the dispute resolution procedures set forth in Section 14 of the Compact.

(g) Emergency waiver of an internal control procedure.

- (1) In the event of an emergency, the Nation Gaming Operation may seek a waiver of an internal control procedure. The SGA must concur, in writing, with a copy to SGO, that an emergency exists before waiving an internal control procedure.
- (2) The Nation Gaming Operation shall submit a description of the emergency and the circumstances necessitating the emergency waiver to the SGA, with a copy to SGO, within five (5) business days of the adoption of the emergency waiver, if granted.
- (3) As soon as the circumstances necessitating the emergency waiver abate, the Nation Gaming Operation shall resume compliance with the approved internal control procedures. If the emergency does not abate, the Nation Gaming Operation shall seek, as soon as practicable, an amendment of the internal control procedures pursuant to Section l(d) above.

2. Organization of Appendix; definitions; general internal controls, accounting or fiscal internal controls; keno related internal controls; gaming equipment internal controls

(a) This Appendix is organized as follows:

- (1) Definitions;
- (2) General internal controls;
- (3) Accounting or fiscal internal controls;
- (4) Keno related internal controls; and
- (5) Gaming equipment internal controls.

(b) Inclusion in one section of the internal controls of a subject matter does not restrict the applicability of that topic if contained in a different section. The Appendix should be read as a whole and has been subdivided only for the convenience of reading.

3. Definitions

As used in this Appendix:

"Accounting Department" or "Gaming Facility Accounting Department" is that department established in the Nation Gaming Operation's system of organization in accordance with the Compact and its Appendices;

"Authorized Game" or "Authorized Gambling Game" is limited to any game specifically authorized in Appendix A of the Compact.

"Boxperson" refers to an individual assigned to supervise other individuals operating certain table games authorized in Appendix A of the Compact.

"Cage cashiers" are the cashiers performing any of the functions in the cashier's cage as set forth in this Appendix B;

"Cage Supervisor" means any person holding a license as required by the Compact and the Nation Gaming Operation's approved jobs compendium which allows that person to supervise personnel and functions within the cashier's cage.

"Cash" means United States currency and coin or foreign currency and coin that has been exchanged for its equivalent United States currency and coin value.

"Cash Equivalent" means an asset that is readily convertible to Cash, including, but not limited to, any of the following:

- (1) Travelers checks.

- (2) Certified checks, cashier's checks, and money orders.
- (3) Personal checks or drafts.
- (4) Credit extended by the Nation Gaming Operation, a Recognized Credit Card company, or banking institution.
- (5) Any other instrument that the SGA deems, in writing, to be a Cash Equivalent.

Other than Recognized Credit Cards or credit extended by the Nation Gaming Operation, all instruments that constitute a Cash Equivalent shall be made payable to the Nation Gaming Operation, bearer, or Cash. If an instrument is made payable to a third party, then the instrument shall not be deemed a Cash Equivalent.

"Chief Financial Officer" is the senior executive of the Nation Gaming Operation with overall responsibility for its Internal and Accounting Controls, who shall report to the Chief Operating Officer;

"Chief Operating Officer" is the senior executive of the Nation Gaming Operation exercising the overall management or authority over all the operations of the Nation Gaming Operation and the carrying out by employees of the Nation Gaming Operation of their duties;

"Chip" means a non-metallic or partially metallic representation of value redeemable for Cash only at the Gaming Facility and issued by the Nation Gaming Operation for use in gaming.

"Closer" means the original of the Table Inventory Slip upon which each Gaming Table inventory is recorded at the end of each Shift;

"Compact" means this agreement between the Nation and the State of New York;

"Compensation" means direct or indirect payment for services performed including, but not limited to, salary, wages, bonuses, deferred payments, overtime, chattels and premium payments;

"Count" means the Nation Gaming Operation's gaming receipts.

"Count Room" means the room or rooms designated for the counting, wrapping, and recording of the Nation Gaming Operation's gaming receipts as more specifically described in Section 15(a) of this Appendix.

"Counter Check" is the document reflecting a payment by a patron at a Gaming Table drawn on a form prepared by the Nation Gaming Operation against a checking account of the patron in accordance with this Appendix B;

"Councerfeit Chips" means Chip-like objects that have not been issued by the Nation Gaming Operation or approved for use under the Compact and its Appendices.

"Credit Slip" (known as a "Credit") is the document reflecting the removal of gaming Chips, coins and plaques from a Gaming Table in accordance with this Appendix B;

"Dealer" refers to an individual assigned to operate live gaming described in Appendix A of the Compact.

"Drop Box" means the box attached to a Gaming Table that is used to collect, but is not limited to, any of the following items:

- (1) currency.
- (2) coin.
- (3) Chips.
- (4) Cash Equivalents.
- (5) damaged Chips.
- (6) documents verifying the extension of credit.
- (7) Request for Fill and credit forms.
- (8) Fill and Credit Slips.
- (9) error notification slips.
- (10) table inventory forms.
- (11) All other forms used by the Nation Gaming Operation and deposited in the Drop Box as part of the audit trail.

"Enhanced Payout" means a Class III game offered and sponsored by the Nation Gaming Operation in which gaming patrons participate in a gambling game or an approved variation of a gambling game and thereby qualify for receiving, upon a specified outcome in the gambling game or the occurrence of a specified event, a payment or thing of value approved in writing by the SGA in excess of published Payouts contained in the System of Internal Controls approved in writing by the SGA.

"Fill Slip" (or "Fill") is the document reflecting the distribution of gaming Chips, coins and plaques to a Gaming Table as provided in this Appendix B;

"Financial Statement" means any of the following:

- (1) balance sheet.
- (2) income statement.
- (3) profit and loss statement.
- (4) statement of Cash flow.
- (5) sources and uses of funds statement.

"Front Money" means a deposit of value made by a patron at the cage.

"Gaming Device" shall have the meaning set forth in Section l(m) of the Compact.

"Gaming Device Drop" means the amount of coins and slot tokens in a slot drop bucket or slot Drop Box, the amount of currency and coupons in a Slot Cash Storage Box, and the amount of electronic credits withdrawn from patron accounts.

"Gaming Device Win" means the amount determined by subtracting the hopper fills, other than initial fills of Gaming Device hoppers and hopper storage areas or any subsequent increases to those initial fills, and Cash Payouts from the Gaming Device Drop.

"Gaming Facility" means those portions of a structure in which the

Nation conducts Class III Gaming pursuant to the Compact. For purposes of this definition, a Gaming Facility shall be deemed to include only those areas of a structure that the Nation uses for Class III Gaming operations. Notwithstanding the foregoing, no areas of a structure exclusively used for Class I or Class II gaming or for non-gaming activities shall be considered part of a Gaming Facility.

"Gaming Facility Department" means the department of the Nation gaming Operation responsible for conducting Class III Gaming under the Compact and its Appendices.

"Gaming Facility Manager" means a person who has the ultimate responsibility to manage, direct, or administer the conduct of the Nation Gaming Operation.

"Gaming Facility Supervisor" is a reference to a person employed in the operation of the Authorized Games in a Supervisory capacity or empowered to make discretionary decisions which regulate the Nation Gaming Operation and perform certain functions under the Compact or its Appendices, including but not limited to, Pit Managers, Gaming Facility Shift Managers, the Assistant Gaming Facility Manager and the Gaming Facility Manager;

"Gaming Table" means any non-electrical or non-electromechanical apparatus authorized for use in the Class III Gaming authorized pursuant to Appendix A of the Compact. Nothing in these rules prohibits the use of electronic progressive or bonusing equipment in conjunction with play on a Gaming Table, nor the use of electronic equipment to monitor or assist in the conduct of a live device games provided such equipment has first been approved in writing by the SGA and the SGO.

"Hand" means either one game in a series, one deal in a card game, or the cards held by a player in a card game.

"Handle" means the total amount of coins, slot tokens, currency and electronic credits invested by a patron to activate the play of a Gaming Device.

"Hopper Inventory Level" means the total dollar value of the initial fill of a Gaming Device hopper or an adjusted total that includes any subsequent increase in the total dollar value of the initial fill.

"Imprest Basis" means the basis on which cashier's cage funds are replenished from time to time by exactly the amount of the net expenditures made from the funds and amounts received and in which a review of the expenditure is made by a higher authority before replenishment;

"Incompatible Function" means a function, for accounting and internal control purposes, that places any person or department in a position to both perpetrate and conceal errors or irregularities in the normal course of his or her duties. Anyone both recording transactions and having access to the relevant assets is in a position to perpetrate errors or irregularities. Persons may have incompatible functions if such persons are members of departments which have Supervisors who are not independent of each other;

"Independent Certified Public Accountant" means a professional accountant suitably qualified and sufficiently independent to act as auditor of the Nation Gaming Operation;

"Inspector" means an employee of the SGA duly appointed by the SGA as an Inspector;

"Internal Control System" or "System of Internal Controls" means the internal procedures, administration, and accounting controls designed by the Nation Gaming Operation for the purpose of exercising control over the Class III Gaming operation and its assets.

"Jackpot" means any money, merchandise or thing of value to be paid to a patron as the result of a specific combination(s) of characters indicated on a Gaming Device.

"Keno Drop" means the sum of the total amount of currency, coin, gaming Chips and coupons wagered on keno tickets.

"Keno Payout" means the currency, coin or Nation Gaming Operation Check paid to a player in exchange for a winning keno ticket.

"Keno Win or Loss" means the amount of currency, coin, gaming Chips and coupons wagered by patrons at keno less the amount of currency and coin collected by patrons for winning keno Wagers.

"Layout" means the cloth covering a Gaming Table, containing designated areas for patrons to place the various Wagers of the game, and such rules of the game, payoff odds and other information or graphics as the SGA and the SGO shall require.

"Location Number" means the unique number assigned to each site on a gaming floor that contains the following: a Pit and each Gaming Table located therein.

"Main Bank" means the Nation Gaming Operation department that is responsible for at least all of the following:

- (1) Cashing customer checks.

- (2) Establishing hold check privileges.
- (3) Redeeming Chips.
- (4) Providing working funds to all operational departments.
- (5) Deposits of Front Money.
- (6) Maintaining custody of all inventory.
- (7) Processing Markers.
- (8) Assuming responsibility for all of the following individuals and physical structures:
 - a. Cashiers.
 - b. Main Bank vault or vaults.
 - c. Any other structure that houses Chips or other representatives of value that the Main Bank is accountable for.

"Marker" means an electronic or written document that evidences an extension of credit to a patron by the Nation Gaming Operation, including any writing taken in consolidation, redemption, or payment of a previous Marker.

"Master Game Report" means a record of the computation of the win or loss for each Gaming Table per Shift;

"Match Game Coupon" means a coupon with a fixed, stated value that is

issued, utilized and redeemed, and the stated value of which, when presented by a patron with gaming Chips which are equal to or greater in value to the stated value of the coupon, is included in the amount of the patron's Wager in determining the Payout on any winning bet at an Authorized Game.

"Nation Gaming Operation" means the enterprise, business or entity operated or authorized by the Nation to operate or conduct any form of Class III Gaming on Nation lands pursuant to the Compact; provided, however, that the Compact shall apply to operations of such enterprise, business or activity only to the extent that such operations are directly related to Class III Gaming undertaken by the Nation pursuant to the Compact.

"Nation Gaming Operation Bankroll" means Cash maintained in the Gaming Facility, excluding any funds necessary for the normal operation of the Gaming Facility, such as change banks, cashier imprest funds and redemption area funds.

"Nation Gaming Operation Check" means a check which is drawn by the Nation Gaming Operation upon their account at a banking institution and made payable to a person in redemption of the Nation Gaming Operation's gaming Chips, in return, either in whole or in part, of a person's deposit on account with the Nation Gaming Operation, or for winnings from keno payoffs or Gaming Table progressive Payouts. At a minimum, such identification method utilized for issuing a Nation Gaming Operation Check shall include an endorsement or imprinting on the check which indicates that the check is issued in redemption of gaming Chips, in return of funds on account with the Nation Gaming Operation or for winnings from keno payoffs, or Gaming Table progressive Payouts.

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"Payout" means the winnings that result from a Wager.

"Photographic Identification" means a driver license or other piece of identification which is issued by a governmental entity and which has a photograph of the individual affixed to, or otherwise part of, the document.

"Pit" means the area enclosed or encircled by the arrangement of the Gaming Tables in which Nation Gaming Operation personnel administer and supervise the live games played at the tables by patrons located outside the perimeter of the area.

"Pit Clerk" means the person located at a desk in the Pit to prepare, under the supervision and direction of the Cage Manager, documentation required for the operation of live gaming including but not limited to, Requests for Fills, Requests for Credits, and Counter Checks;

"Progressive Controller" means the hardware and software that controls all communication among the live gaming within a progressive Gaming Device link or a progressive Gaming Table link and its associated progressive meter.

"Progressive Jackpot" means a value determined by application of an approved formula to the income of independent, local, or interlinked live Gaming Devices.

"Public Area" means the areas in the Gaming Facility that are open to the public in accordance with the Nation Gaming Operation's approved System of Internal Controls.

"Recognized Credit Card" means a credit or charge card that:

- (1) is issued by or under an agreement with a company that, as a normal part of its business, supplies its customers, either directly or through a national credit card network, with credit or charge cards that can be used for and are routinely accepted in consumer transactions;
- (2) qualifies as a credit card for purposes of Regulation Z issued by the Board of Governors of the Federal Reserve System (12 C.F.R. Part 226);
- (3) expires on an expiration date that is imprinted on the card and is later than the date of the transaction for which the card is presented; and
- (4) has a clearly visible registered credit card logo that is a permanent part of the card.

"Request for Credit" is the document reflecting the authorization for preparation of a credit with respect to removal of gaming Chips, coins and plaques from a Gaming Table in accordance with the Compact and its Appendices;

"Request for Fill" is the document reflecting the request for the distribution of gaming Chips, coins and plaques to a Gaming Table as provided in the Compact and its Appendices;

"Restricted Areas" or "Restricted Nation Gaming Operation Areas" means the cashier's cage, the hard Count Room, the soft Count Room, the interior of Gaming Table game Pits, the Surveillance Room, the specific areas designated and approved by the SGA in writing for the possession and maintenance of gaming equipment (such as computers) that supports the conduct of gaming in the Gaming Facility, the areas

used for storing or destroying dice or cards, any additional area that the Nation Gaming Operation designates as restricted in its internal controls, and any other area specifically designated by the SGA in writing as restricted.

"Secure Storage Facility" means any area, room, furniture, equipment, machinery or other device used by the SGA for the storage of confidential information, access to which is limited to authorized personnel at all times by locks, alarms, codes or other appropriate security precautions.

"Security Department Member" means any person employed by the Nation Gaming Operation to provide physical security in an establishment.

"Sensitive Keys" means keys that either Gaming Facility Supervisor or the SGA considers sensitive to the Nation Gaming Operation and therefore require strict control over custody and issuance, in accordance with the Nation Gaming Operation's approved System of Internal Controls and this Appendix.

"SGA" or "Seneca Gaming Authority" means the Nation's existing gaming commission established by the Nation as the Nation agency responsible for regulating Class III Gaming undertaken by the Nation pursuant to the Compact;

"SGO" or "State Gaming Officials" means the officials designated by the State to fulfill the State's responsibility to ensure Nation Gaming Operation and SGA compliance with the terms of the Compact.

"SGO Office" means dedicated office space in the Gaming Facility which is for the exclusive use of the SGO for performing any of its functions.

"Shift" means either the normal daily work period of a group of employees administering and supervising the operations of live gaming, and cashier's cage working in relay with another such succeeding or preceding group of employees;

"Slot Cash Storage Box" has the meaning set forth in Section 16(c) of this Appendix B.

"Supervisor" means a person employed in the operation of the Authorized Games in a Gaming Facility in a Supervisory capacity or empowered to make discretionary decisions which regulate Nation Gaming Operation operations, including but not limited to, Boxpersons, floorpersons, Pit bosses, poker Shift Supervisors, table games Shift managers, the assistant Nation Gaming Operation manager, and the Nation Gaming Operation manager.

"Surveillance Room" means a room for the use of the surveillance employees of the SGA.

"Table Drop" means the total dollar amount of United States and foreign currency, Chips, issuance copies of Counter Checks, Cash Equivalents, Markers or credit contained in the Drop Box of a Gaming Table.

"Table Win" means the dollar amount which is won by the Nation Gaming Operation through play at a Gaming Table and which is the total of the Table Drop, plus ending Chip inventory, minus opening Chip inventory, plus Chip credits, minus Fills.

"Theoretical Gaming Device Payout Percentage" means the sum of the number of coins expected to be paid by a Gaming Device automatically and the number of coins expected to be paid manually as a result of

Jackpots divided by the expected number of coins to be played in a Gaming Device.

"Value Chip" means a Chip that is clearly and permanently impressed, engraved, or imprinted with the name of the Nation Gaming Operation's trade name and the specific monetary denomination of the Chip.

"Wager" means an item that is representative of value risked on a Class III gaming activity game authorized under Appendix A of the Compact.

"Washing" or "Chemmy Shuffle" means a mixing of the cards, during which the cards are placed face down on the table and randomly intermixed by the Dealer using the heels of the palms of the hands, by rotating one hand in a circular clockwise motion and the other hand in a circular counterclockwise motion, with each hand completing at least eight full circles.

"Wire Transfer" means a transfer of funds by means of the Federal Reserve Bank wire system in accordance with the requirements of 12 C.F.R. 210.25 et seq. and the Compact and its Appendices.

References to "slot" shall, if deemed appropriate by context, be applicable to other Gaming Devices.

4. Organization of the Nation Gaming Operation and SGA

(a) Organization of the Nation Gaming Operation.

(1) The Nation Gaming Operation shall, at a minimum, establish certain departments to manage and oversee the activities of the Gaming Facility. Each of the following departments shall be established by the Nation Gaming Operation:

a. A Gaming Facility Department supervised by a Gaming Facility Manager who shall perform independently of all other departments and shall report directly to the Chief Operating Officer. The Gaming Facility Manager shall be responsible for the operation and conduct of all forms of authorized gaming conducted in the Gaming Facility.

b. A Credit Department supervised by a Credit Manager or Director of Credit who shall cooperate with, yet perform independently of all other departments and shall report directly to the Chief Operating Officer. The Credit Manager or Director of Credit shall be responsible for the credit function including, but not limited to, the following:

1. the verification of patron credit references;
2. the establishment of patron credit limits; and
3. the maintenance, review and update of the patron's credit limits; all to be conducted in accordance with the requirements set forth in

these Standards.

- c. A Security Department supervised by a Director of Security who shall cooperate with, yet perform independently of, all other departments and shall report directly to the Chief Operating Officer. The Director of Security shall be responsible for the overall security of the establishment including, but not limited to the following:
 1. the physical safeguarding of assets transported within the Gaming Facility, and Cashier's cage departments;
 2. the recording of any and all unusual occurrences within the Gaming Facility for which the assignment of a Security Department employee is made. Each incident, without regard to materiality, shall be assigned a sequential number and, at a minimum, the following information shall be recorded in indelible ink in a bound notebook from which pages cannot be removed and each side of each page of which is sequentially numbered:
 - A. the assignment number;
 - B. the date;
 - C. the time;
 - D. the nature of the incident;

- E. the person involved in the incident; and
 - F. the security department employee assigned.
3. all security department reports shall be made available to the SGA and the SGO On a Daily Basis;
 4. the physical safety of patrons and their property while in the Nation's Gaming Operation;
 5. the physical safety of personnel employed by the Nation Gaming Operation and their property while in the Nation's Gaming Operation; and
 6. the furnishing to the SGA of a sufficient number of two-way radios, each of which is capable of transmitting and receiving oral transmissions over confidential and interagency channels.
- d. An Accounting Department, supervised by a Director of Accounting who shall report directly to the Chief Financial Officer. The Director of Accounting shall be responsible for, but not limited to, the following:
1. accounting controls;
 2. the preparation and control of records and data required by this Appendix;
 3. the control of stored data, the supply of unused forms, the accounting for and comparing of forms

used in operating the Gaming Facility and required by this Appendix; and

4. the control and supervision of the cashier's cage.
- e. A Cage Operations Department supervised by a Cage Manager who shall supervise Cage Cashiers and cooperate with, yet perform independently of, the Gaming Facility and Security Departments and shall be under the supervision of, and report directly to, the Director of Gaming Facility Accounting. The Cage Manager shall be responsible for, but not limited to, the following:
1. the custody of currency, token, coin, Patron Checks, gaming Chips, promotional coupons, gift certificates, documents and records normally associated with the operation of a cashier's cage;
 2. the approval, exchange, redemption and consolidation of Patron Checks received for the purpose of gaming in conformity with the Compact and its Appendices;
 3. the receipt, distribution and redemption of gaming Chips, tokens, plaques and promotional coupons in conformity with the Compact and its Appendices; and

4. such other functions normally associated
the operation of a cashier's cage.

(2) Training of Nation Gaming Operation personnel. The Nation Gaming Operation's personnel shall be trained in all accounting and internal control practices and procedures relevant to each employee's individual function. Special instructional programs shall be developed by the Nation Gaming Operation in addition to any on-the-job instruction sufficient to enable all members of the departments required by the Compact and its Appendices to be thoroughly conversant and knowledgeable with the appropriate and required manner of performance of all transactions relating to their function.

(b) Organization of the SGA. The SGA shall, for the Nation, have responsibility for regulation of the Nation Gaming Operation and may, for that purpose, employ Inspectors who may be present in the Gaming Facility during all hours of operation and who shall be under the supervision of personnel accountable solely to the SGA and not to any employees of the Nation Gaming Operation. Each of the following departments shall be established by the SGA:

(1) Inspectors. SGA Inspectors shall investigate and report to the SGA any failure by the Nation Gaming Operation to comply with any of the provisions of the Compact or its Appendices, the applicable laws and ordinances of the Nation, and Federal law and shall also report, process and resolve non-criminal complaints by patrons, non-criminal violations committed by patrons, non-criminal violations committed by gaming employees and non-criminal violations

committed by the Nation Gaming Operation. The SGA shall require the Nation Gaming Operation to correct such failure upon such terms and conditions as the SGA may determine necessary. Inspectors shall also have the responsibility to carry out duties required by the SGA, as enumerated by the Compact and its Appendices.

- (2) An Internal Audit Department supervised by an Internal Audit Manager who shall perform independently of all other departments and shall report directly to the SGA regarding matters of policy, purpose, responsibilities, authority and daily operations. Such Department shall be responsible for, but not limited to, the following:
 - a. appraisal of the adequacy of system of internal control;
 - b. compliance with the approved System of Internal Controls;
 - c. reporting of instances of non-compliance with the approved System of Internal Controls to the SGA, with a copy to SGO.
 - d. reporting of any material weaknesses in the approved System of Internal Controls; and
 - e. recommendation of procedures to eliminate any material weaknesses in the approved System of Internal Controls.

- (3) A Surveillance Department shall be established within the

SGA that shall operate pursuant to section 7 of this Appendix.

5. Forms, records and documents

- (a) All information required by the Compact or its Appendices to be placed on any form, record, or document and in stored data shall be recorded on such form, record, or document and/or in stored data, in ink or other permanent form.
- (b) Whenever duplicate or triplicate copies are required of a form, record, or document:
 - (1) The original, duplicate, and triplicate copies shall be color coded and have the name of the recipient originally receiving a copy preprinted on the bottom of that copy, so as to differentiate one from the others;
 - (2) If the Nation Gaming Operation prepares more copies than required by the Compact or its Appendices, such forms, records, and documents shall to be inserted in a locked dispenser, the last copy of which shall remain in a continuous, unbroken form in the dispenser; and
 - (3) Whenever, under the Compact or its Appendices, forms or serial numbers are required to be accounted for, or copies of forms are required to be compared for agreement and exceptions are noted, such exceptions shall be reported immediately in writing to the Internal Audit Department and the SGA for investigation, with a copy to SGO.
- (c) Unless otherwise specified in the Compact, or its Appendices or exempted in writing by the SGA, all forms, records, documents, and/or stored data required to be prepared, maintained, and controlled by the Compact or its Appendices shall:

- (1) be in a form prescribed or authorized in writing by the SGA,
and
 - (2) have the name of the Nation Gaming Operation and the title of the
form, record, document, and/or stored data imprinted or preprinted
thereon or therein.
- (d) Nothing in this section shall be construed as prohibiting or discouraging
the Nation Gaming Operation from preparing more copies of any form,
record, or document than that prescribed by the Compact or its
Appendices.

6. Records retention; format of records

(a) Records retention.

- (1) The Nation Gaming Operation shall maintain, in a climate controlled place secure from theft, loss, or destruction, adequate records of its business and accounting operations. The Nation Gaming Operation shall make the records available to the SGA and the SGO upon request. The Nation Gaming Operation shall retain the records for not less than seven (7) years. The records shall include, but not be limited to, all of the following:

 - a. all correspondence with, or reports to, the SGA and the SGO or any local, State, or Federal governmental agency.
 - b. all correspondence concerning the acquisition, construction, maintenance, or business of a proposed or existing Gaming Facility or support facility.
 - c. a personnel file on each employee.
- (2) Notwithstanding paragraph (1), above, the Nation Gaming Operation shall retain copies of all promotional and advertising material, records, or complimentary distributions for the Gaming Facility for at least one (1) year, unless otherwise requested by the SGA.
- (3) The Nation Gaming Operation shall keep and maintain accurate, complete, legible, and permanent records of any books, records, or documents pertaining to, prepared in, or

generated by, the class III gaming operation, including, but not limited to, all of the following:

- a. forms;
- b. reports;
- c. accounting records;
- d. ledgers;
- e. subsidiary records;
- f. computer generated data;
- g. internal audit records;
- h. correspondence; and
- i. personnel records.

The Nation Gaming Operation shall keep and maintain the books, records, or documents in a manner and form approved in writing by the SGA.

- (4) The Nation Gaming Operation shall organize and index all required records in a manner that enables the SGA and the SGO to locate, inspect, review, and analyze the records with reasonable ease and efficiency.

- (b) Format of records.

- (1) All information required by the Compact or its Appendices shall be placed on a form, record or document or in stored data in ink or other permanent form.
- (2) Whenever duplicate or triplicate copies are required of a form record or document:
 - a. The original, duplicate and triplicate copies shall be color coded, serial numbered and have the name, title or description of the operating department receiving the copy, imprinted thereon;
 - b. If under the Compact or its Appendices, forms, records, and documents are required to be inserted in a locked dispenser, the last copy shall remain in a continuous unbroken form in the dispenser; and
 - c. If under the Compact or its Appendices, forms or serial numbers of forms are required to be accounted for or copies of forms are required to be compared for agreement and exceptions noted, such exceptions shall be reported immediately in writing to the Internal Audit Department and the SGA for investigation, with a copy to SGO.
- (3) Unless otherwise specified in the Compact or its Appendices or exempted in writing by the SGA, all forms, records, documents and stored data required to be prepared, maintained and controlled by the Compact or its Appendices shall be located at the Gaming Facility or such other location as is approved in writing by the SGA. Such off-site storage location shall meet the physical requirements

of paragraph (a) (1).

7. Surveillance requirements of Gaming Facility

(a) Surveillance; in general.

(1) The SGA shall require that the Surveillance Room be staffed by employees of the SGA employed to work in the Surveillance Department at all times that any of the following activities occur:

- a. gaming;
- b. currency collection process;
- c. Count process;
- d. armored car Cash deliveries and pickups; and

Surveillance personnel should be trained in the use of the surveillance equipment and have knowledge of the games and house rules.

(2) Subject to prior written approval of the SGA, the Nation Gaming Operation may install different or new types of audio or visual recording or surveillance technology in the Gaming Facility and related facilities for purposes of compliance with the Compact and its Appendices.

(b) Surveillance Room specifications.

(1) There shall be a recording and monitoring room in the Gaming Facility. The room for the use of the surveillance employees of the SGA shall be designated the "Surveillance

Room."

- (2) The Surveillance Room shall be in compliance with both of the following provisions:
 - a. Be located out of the general view of patrons and non-surveillance employees; and
 - b. Have access limited to Surveillance Room personnel and persons approved by the SGA to enter the area.
- (c) Secured delivery station specifications.
- (1) The Nation Gaming Operation shall provide a secure structure for all of the following purposes:
 - a. armored car Cash deliveries;
 - b. armored car Cash pickups; and
 - c. the delivery and pickup of tokens, Chips and other valuables.

The structure shall be designated the "secured delivery station" and shall be covertly surveilled and monitored during all hours of operation. One-on-One Continuous Surveillance shall be conducted when deliveries and pickups are made.

- (2) A secured delivery station shall be in compliance with all of the following provisions:

- a. Be located out of the general view of patrons, non-surveillance employees, and nonsecurity employees;
- b. Have not less than two (2) garage stalls large enough to accommodate two (2) armored trucks and still allow adequate space for personnel to comfortably walk entirely around each vehicle;
- c. Have two (2) independencly operated garage doors that are electronically controlled from the Surveillance Room; and
- d. Have a secured room between the secured delivery station and the Gaming Facility. The room shall have electronically operated sliding bulletproof glass doors that are programmed so that both doors cannot be open at the same time, and neither door can open unless both garage doors to the secured delivery station are closed and secured.
- e. Have color cameras and monitors which are in compliance with the specifications for surveillance equipment in this subdivision which surveil and monitor activities in all of the following areas:
 1. The secured delivery station;
 2. The secured room immediately adjacent to the secured delivery station;
 3. The area outside the garage doors to the secured delivery station; and

4. The area inside the Gaming Facility.

- (3) Surveillance personnel shall advise security officers and SGA personnel in advance of deliveries and pick-ups so the officers and personnel can provide foot escorts to and from secured areas within the Gaming Facility. Delivery personnel who are not Nation Gaming Operation personnel shall not be allowed to enter in the secured areas, Restricted Areas of the Gaming Facility without an escort.

(d) Required surveillance equipment.

- (1) The Nation Gaming Operation shall install a closed circuit television system in accordance with this subdivision.
- (2) There shall be a sufficient number of monitors in the Surveillance Rooms to adequately protect patrons and ensure the integrity of the approved gaming. The Surveillance Room shall have appropriate capabilities to ensure that all surveillance cameras are accessible to monitors in the room.
- (3) Each table game shall have fixed and/or pan, tilt and zoom cameras which are in compliance with the requirements for surveillance equipment in this subdivision and which continuously monitor and record all games during all hours of gaming operations.
- (4) The equipment utilized in the closed circuit television system shall, unless approved in writing by the SGA, be in compliance with all of the following requirements:

- a. A black and white television camera shall be in compliance with all of the following requirements:
 - 1. Be solid-state;
 - 2. Be 2/3" or 1/2" format;
 - 3. Have a minimum of 400 lines of resolution, be installed in fixed positions, and have a matrix control or pan, tilt, and zoom capabilities; and
 - 4. Be secreted from the public and nonsecurity personnel view to effectively and clandestinely monitor, in detail, from various points, the coverage described in this subdivision.

- b. A color television camera shall, unless approved in writing by the SGA, be in compliance with all of the following requirements:
 - 1. Be 2/3" or 1/2" format;
 - 2. Have a minimum of 320 lines of resolution and have a matrix control or pan, tilt, and zoom capabilities; and
 - 3. Be secreted from the public and nonsecurity personnel view to effectively and clandestinely monitor, in detail, from various points, the coverage described in this subdivision.

- c. A camera that is utilized for observing Chips, dice,

playing cards, keno balls, and numbered positions on the roulette wheel shall be equipped with lenses of sufficient magnification capabilities to allow the operator to clearly distinguish the value of all of the following:

1. Chips;
 2. dice;
 3. playing cards;
 4. Gaming Device reels and screens; and
 5. numbered positions on the roulette wheel.
- d. A monitor shall be in compliance with all of the following requirements:
1. Meet or exceed the resolution requirements for recording cameras that have solid state circuitry;
 2. Have a date and time generator that is synchronized to a central clock which can be displayed on any of the monitors while recording on videotape, video photographs, or other means of electronic recording; and
 3. At a minimum, a monitor screen shall measure diagonally not less than twelve (12) inches and have all controls located on the front of the

monitor screen.

- e. A recorder shall be in compliance with all of the following requirements:
 - 1. Be capable of producing high quality, first generation photographic images that meet or exceed the resolution requirements for recording cameras;
 - 2. Be capable of recording, in a SGA-approved format, with high speed scanning and a flickerless playback capability in real time;
 - 3. Be capable of recording the images depicted by every camera in the system; and
 - 4. There shall be a sufficient number recorders to allow for the simultaneous recording of the coverage described in this subdivision, off-line playback, and duplication capabilities.

- f. A printer that is capable of printing photographs from surveillance-related recording equipment shall be provided and shall be in compliance with all of the following requirements:
 - 1. Be capable of adjustment; and
 - 2. Upon command, be capable of generating instantaneous, clear, color or black and white photographic copies of images depicted on the

surveillance monitor screen or recording devices.

- g. A date and time generator shall be in compliance with all of the following requirements:
 - 1. Be based on a synchronized central or master clock;
 - 2. Be capable of being recorded on videotape or other SGA-approved medium and be visible on every video monitor; and
 - 3. Have a backup power supply so that the date and time generator remains accurate despite power interruptions.

- h. The closed circuit television system shall allow audio capabilities in the soft Count Rooms and any other area of the Gaming Facility required by the SGA.

- i. A wiring system shall be designed to prevent tampering and must be in compliance with both of the following requirements:
 - 1. Be supplemented with a backup gas generator power source or diesel generator power source, or both, that automatically engages in case of a power failure; and
 - 2. Be capable of returning full power within seven (7) to ten (10) seconds after a power failure.

- j. Switchers for all surveillance cameras shall be capable of both manual and automatic sequential switching for the appropriate cameras.
 - k. Both of the following shall be in reserve in the event of equipment malfunctions:
 - 1. A minimum of two (2) backup pan, tilt and zoom cameras; and
 - 2. Two (2) video/audio recording devices.
 - 1. Fixed-color television cameras designated for table games shall, unless approved in writing by the SGA, be in compliance with all of the following requirements:
 - 1. Be 2/3" or 1/2" format;
 - 2. Have a minimum of 320 lines of resolution, be fixed, and be stationed over table games; and
 - 3. Be secreted from the public's and nonsecurity personnel's view to effectively and clandestinely monitor, in detail, the patrons, players, Dealers, and Gaming Devices or table games.
- (5) Surveillance Room telephones shall be connected to the general telephone system and have at least one (1) direct outside line that is independent of the general telephone system. Surveillance radio communications shall be

accessible to the security department and the SGA.

(e) Required surveillance.

- (1) The surveillance closed circuit television system shall be capable of covertly monitoring activities on the gaming floor and related areas, including patron parking areas and patron passages leading to and from the gaming and non-gaming areas.
- (2) The SGA may require additional areas be monitored to ensure compliance with the Compact and its Appendices and to ensure the safety of employees and patrons and the integrity of gaming.

(f) Areas of surveillance system coverage.

- (1) All of the following areas shall be covertly monitored in accordance with this subdivision:
 - a. live gaming and Gaming Devices;
 - b. Pits;
 - c. the Main Bank;
 - d. Count Rooms;
 - e. secured delivery station; and
 - f. garages, pedestrian walkways, and parking lots.

- (2) The surveillance system shall provide an overall view of Gaming Tables that permits clear identifying of all of the following:
 - a. Dealers, including the information reflected on their identification badges;
 - b. patrons;
 - c. Hands of all participants;
 - d. facial views of all participants;
 - e. facial views and the information reflected on their identification badges of all Pit personnel; and
 - f. activities of all Pit personnel.

- (3) The playing surface of the tables shall be viewed with sufficient clarity to determine all of the following:
 - a. the value of all Chips;
 - b. playing card suits and values; and
 - c. game results.

- (4) The playing surface of the tables shall be viewed with sufficient clarity to clearly observe, in detail, all of the following:
 - a. Chip trays;

- b. token holders;
 - c. Cash receptacles (drop slots);
 - d. tip boxes;
 - e. dice;
 - f. card shuffle devices; and
 - g. card dealing shoes.
- (5) Roulette tables shall be monitored only with color pan, tilt and zoom cameras.
- (6) The surveillance system shall be capable of providing a reasonably clear view of all of the following:
- a. activity by players and employees, alone or in concert, that may constitute violations of the Compact and its Appendices, the System of Internal Controls, cheating, stealing or any other illegal or unlawful act;
 - b. failure of employees to follow proper procedures and internal controls;
 - c. movement of Cash, coin, tokens, playing cards, Chips, and dice throughout the Gaming Facility. Upon notification of intended movement of any Cash, playing cards, Chips, or dice, both of the following provisions shall be complied with:

1. The surveillance system personnel shall record the notification in the surveillance log; and
 2. During the course of routine surveillance, the progress of the movement shall be monitored to ensure that all procedures and internal controls are followed;
- d. areas where any of the following items are stored shall be continuously monitored by a dedicated camera capable of continuous recording, motion activation, or both:
1. Cash and coin;
 2. Chips and tokens;
 3. playing cards;
 4. dice; and
 5. records required to be maintained and stored on-site;
- e. areas where any of the following items are transported or stored shall be continuously monitored by a dedicated camera capable either of rcontinuous ecording, or motion activation, or both:
1. Chips and tokens;
 2. Cash and coin, and

3. Cash Equivalents.

(g) Surveillance system video recording requirements.

- (1) The Surveillance Department shall visually record all of the following activities:
 - a. observed criminal activity;
 - b. arrests or evictions;
 - c. observed procedural violations by employees;
 - d. detention of persons by security department personnel;
 - e. emergency activities capable of being observed by the system;
 - f. armored car and other delivery and pickups from the secured delivery station; and
 - g. any other activity deemed necessary by the SGA to ensure compliance with the Compact and to ensure protection of the employees and public, and the integrity of gaming.
- (2) The Surveillance Department shall audibly and visually record soft Count procedures and visually record hard Count procedures in their entirety.
- (3) The Surveillance Department shall monitor and visually record all of the following activities:

- a. currency collection;
- b. armored car deliveries and pickups in the secured delivery station;
- c. Keno ball drawing devices. The view of the keno area shall be in compliance with both of the following provisions:
 - 1. Provide sufficient clarity to identify the numbers on the balls; and
 - 2. Provide a general view of the keno area with sufficient clarity to identify employees, including the information reflected on their identification badges, involved in the game;
- d. Main Banks, including both of the following:
 - 1. The capability to monitor and record a general overview of the activities in each cage and vault area with sufficient clarity to identify patrons and employees, including the information reflected on employees' identification badges; and
 - 2. A dedicated camera to monitor, record, and identify, with sufficient clarity, the currency, coin, token, and Chip values, and the amounts of Credit Slips and fill slips in any area where fills and credits are transacted;

- e. Security department offices, including complying with all of the following provisions:
 - 1. The capability to monitor and record, both audibly and visually, all activities in any area of the security office where a person may be detained and questioned by the security department. All security areas where a person may be detained and questioned shall display a notice clearly stating that the area is or may be under audio/video surveillance; and
 - 2. All detention and questioning of detained individuals by security personnel must be recorded audibly and visibly;

- f. entrances and exits of the Gaming Facility and entrances and exits of all of the following rooms in the Gaming Facility:
 - 1. Count Rooms;
 - 2. Vaults;
 - 3. Surveillance Rooms; and
 - 4. Security rooms.

- g. the entrances and exits described in this subdivision shall have dedicated monitoring and recording devices that have sufficient clarity to afford a reasonable opportunity to identify any person using the entrances

and exits; and

- h. on-site maintenance and repair service, including complying with all of the following provisions:
 - 1. Surveillance Department personnel shall be notified of any maintenance or repair of any gaming or money handling equipment;
 - 2. Notation of the service shall be made in the surveillance log; and
 - 3. All repairs shall be periodically monitored in conjunction with routine monitoring activities to ensure that proper controls and procedures are being followed by Nation Gaming Operation personnel.

(4) The Surveillance Department shall monitor, by a dedicated camera, and continuously record any progressive Gaming Device or Gaming Devices that have a possible Jackpot Payout of more than one hundred thousand dollars (\$100,000.00) or as required by the SGA.

(h) Retention of recorded activities.

- (1) A recorded activity (visual or audio) shall be retained and maintained in accordance with this subdivision.
- (2) A recording of routine activity shall contain a date and time reading and shall be retained for not less than fourteen (14) days. Recordings of all linked systems shall

be maintained for at least thirty (30) days.

- (3) A copy of visual and/or audio recording of detention or questioning of a detained individual or employee shall be immediately provided to the SGA. The recording shall contain a date and time reading and shall be marked with all of the following:

(a) the date and time the recording was made;

(b) the identities of the employee or employees responsible for the monitoring; and

(c) the identity of the employee who removed the recording from the recorder and the time and date removed.

The original recordings involving suspected or confirmed gaming crimes, unlawful activity or detentions and questioning must be retained for a minimum of thirty (30) days.

- (4) A copy of a recording of a violation of the Compact, its Appendices, the internal controls or criminal activity shall be provided to the SGO upon request. The copy recording shall contain a date and time reading and be marked with all of the following:

(a) the date and time the tape was made;

(b) the identity of the employee responsible for the monitoring; and

- (c) the identity of the employee who removed the recording from the recorder.

The original recordings involving violations of the Compact, its Appendices, the internal controls or criminal activity must be retained for a minimum of thirty (30) days.

- (i) Daily surveillance logs; visitors logs.

- (1) The SGA shall maintain a daily surveillance log and a log of visitors to the Surveillance Room. A daily surveillance log shall be in compliance with all of the following provisions:

- a. Be continuously maintained by surveillance personnel;
- b. Be changed with each Shift change of personnel;
- c. Be chronological; and
- d. Contain, at a minimum, all of the following information:
 - 1. The date and time of each entry;
 - 2. The identity of the employee making the entry;
 - 3. A summary of the activity recorded;
 - 4. Detail whether the activity was monitored; and

5. Detail the disposition of the tape, if recorded, with the meter or counter number that identifies the point on the tape at which the activity was recorded.
- e. Unless otherwise directed by the SGA, include entries for all of the following information:
1. The identity of the Surveillance Room personnel each time they enter or depart the Surveillance Room and the reason for the entry or departure;
 2. The notification of any maintenance or repair of any Gaming Device or money handling equipment;
 3. Drop Box exchanges;
 4. Transfers of Cash, Chips, tokens, cards, or dice;
 5. Any detention or questioning of patrons or employees by the security department, including the identity of the patrons or employees and the security department personnel involved;
 6. The beginning, end, and any interruptions of the soft and hard Count;
 7. An observed violation of the Compact or its Appendices or of the Nation Gaming Operation's System of Internal Controls;

8. An observed criminal activity;
 9. Malfunction or repair of surveillance equipment;
 10. An emergency activity;
 11. Surveillance conducted on anyone or any activity that appears unusual, irregular, or illegal or appears to violate the Compact or its Appendices;
 12. Surveillance conducted at the request of the an employee of the Nation Gaming Operation or an SGA employee; and
 13. Other notations deemed necessary by Surveillance Department personnel or the SGA to ensure compliance with the Compact or its Appendices.
- f. Be retained for not less than seven (7) years.
- (2) A visitors log, which shall be in a book type ledger with pre-numbered the pages, shall be in compliance with all of the following provisions:
- a. Include the signature and gaming license number of anyone other than Surveillance Room personnel on duty, who accesses the Surveillance Room;
 - b. Identify all visitors by name, title or position and identification badge number;

- c. State the department or agency the visitor represents;
 - d. State the reason for access to the room;
 - e. Provide the date and time of arrival and departure from the room; and
 - f. Be retained not less than ninety (90) days.
- (3) All Surveillance Room tapes, logs, and reports shall be in compliance with both of the following provisions:
- a. Be retained in a manner to allow them to be easily retrieved by any of the following:
 - 1. Time;
 - 2. Date;
 - 3. Location of activity; and
 - 4. Type of activity; and
 - b. A copy of all Surveillance Room logs and reports are to be furnished to the SGA On a Daily Basis. Copies of audio or video tapes shall be furnished to the SGO upon request.
- (j) Surveillance equipment; maintenance and malfunctions.
- (1) The SGA shall inform the SGO in advance if surveillance equipment is expected to be out of service due to

maintenance.

- (2) Unless otherwise directed by the SGA, the Surveillance Department shall replace equipment expected to be out of service for more than thirty (30) minutes with alternate camera coverage or, at the discretion of the SGA, shall cover the equipment with live surveillance. In the event that there is a malfunction of surveillance system equipment required by the standards of this section, reasonable effort shall be made to repair such equipment within seventy-two (72) hours after the malfunction is discovered.
 - (3) The SGA will periodically inspect the Surveillance Room to ensure all of the following:
 - (a) All equipment is working properly;
 - (b) Camera views are not blocked or distorted by improper lighting or obstructions; and
 - (c) All required surveillance capabilities are in place.
 - (4) Surveillance personnel shall maintain a log that documents each malfunction and repair of the surveillance system. The log shall state the time, date and nature of each malfunction, the efforts expended to repair the malfunction and the date the malfunction is repaired and any alternative security measures that were taken.
- (k) Emergency procedures.

- (1) In an emergency, the safety of patrons and personnel is the first priority.
 - (2) All of the following actions shall be taken by Surveillance Department personnel in an emergency if sufficient time exists:
 - a. Secure all records;
 - b. Replace all recordings;
 - c. Set recorders for slow speeds;
 - d. Activate dedicated cameras and recording devices; and
 - e. set all other available cameras and recorders.
 - (3) The Nation Gaming Operation shall place cameras and recording devices in areas where unusual occurrences have been observed or where reason exists to believe unusual occurrences will occur.
-
- (1) Incident management training required.
 - (1) The Nation Gaming Operation and the SGA shall require surveillance and security personnel to undergo annual incident management training in cooperation with the appropriate law enforcement agency and fire department.
 - (2) The training will be geared to prepare surveillance and security personnel in the proper procedures to follow in the event of a fire, robbery attempt, bomb threat,

terrorist activity, medical emergency, or other major occurrence. Training will be geared to instruct such personnel in all of the following:

- a. Procedures to follow;
- b. Notifications to make, for example, police, fire, ambulance, hospitals;
- c. Securing the facility;
- d. Communications with appropriate law enforcement agency and the local police and fire department;
- e. Evacuation; and
- f. Fire and medical emergencies.

(m) Surveillance plan.

- (1) A surveillance plan shall be in place not less than thirty (30) days before the commencement of gaming operations by the Nation Gaming Operation. SGA shall provide a copy of the plan to the SGO. The plan shall include both of the following:
 - a. A floor plan or schematic detailing the placement of all surveillance equipment.
 - b. A detailed description of the surveillance system and its equipment.

- (2) The Nation Gaming Operation shall submit all of the following alteration information in writing to the SGA no less than thirty (30) days before the institution of the proposed alteration:
 - a. Details of a proposed change, including the floor plan;
 - b. The reason for the change; and
 - c. Expected results of the change.

- (3) The SGA shall submit the surveillance plan to the SGA for approval with a copy to the SGO. The SGA shall determine if the floor plan needs to be amended as a result of the Nation Gaming Operation's proposed alterations. The Nation Gaming Operation can commence operations if a surveillance plan is approved in writing by the SGA. The Nation Gaming Operation shall not commence operations or institute alterations without the prior written approval of the SGA.

(n) Surveillance of employees.

- (1) An employee whose duties will be monitored in accordance with this subdivision shall be informed before commencing his or her duties that his or her surveillance is a requirement of employment.

- (2) An employee whose duties will be monitored in accordance with this subdivision shall sign a written statement before commencing his or her employment indicating that the employee understands that he or she will be under

surveillance.

- (3) The SGA shall maintain each signed statement for one (1) year after employment ends.
 - (4) An employee shall sign an updated statement before commencing a new position, if the new position requires employee surveillance, or before being rehired into a previous position.
 - (5) An area under surveillance and accessible only to employees shall display a notice clearly stating that the area is under surveillance.
- (o) Communications equipment.

The Nation Gaming Operation shall assure that portable telephone or two-way radio communication equipment, or both, may be operated from all areas of the Gaming Facility, including, but not limited to, secure or underground areas.

8. Personnel assigned to the operation and conduct of gaming

- (a) The Nation Gaming Operation shall be required to employ the personnel herein described in the operation of the Gaming Facility regardless of the position titles assigned to such personnel by the Nation Gaming Operation in its approved jobs compendium. Functions described in this section shall be performed only by persons holding the appropriate SGA issued license required by the Compact and the Nation Gaming Operation's approved jobs compendium to perform such functions, or by persons holding the appropriate SGA issued license required by the Compact and the Nation Gaming Operation's approved jobs compendium to supervise persons performing such functions.
- (1) The Nation Gaming Operation shall at all times maintain a level of staffing that ensures the proper operation and effective supervision of all games in the Gaming Facility authorized under Appendix A of the Compact.
 - (2) The Nation Gaming Operation shall be required to employ a Gaming Facility Manager. The Gaming Facility Manager shall be the executive assigned the responsibility and authority for the supervision and management of the overall operation of the Nation Gaming Operation's Gaming Facility Department including, without limitation, the hiring and terminating of all Nation Gaming Operation personnel, all in accordance with the policies and practices established by the Nation.
 - (3) In the absence of the Gaming Facility Manager, should the Nation Gaming Operation have an assistant Gaming Facility Manager, a table games Shift manager, or keno Shift

Supervisor, as applicable, who is employed within the Gaming Facility Department shall be designated by the Nation Gaming Operation as the person responsible for the overall operation of the Gaming Facility Department and such person shall have the authority of a Gaming Facility Manager.

(b) The following personnel shall be used to operate the Gaming Tables in the Gaming Facility:

- (1) Clerk shall be the person located at a desk in the Pit to prepare documentation required for the operation of Gaming Tables including, without limitation, Requests for Fills, Requests for Credits, Counter Checks and documents that evidence the exchange of gaming Chips or plaques as part of credit transactions.
- (2) Dealers shall be the persons assigned to operate and conduct gaming at tables.
- (3) Stickperson shall be the Dealer assigned to each craps table to control the dice, who may also be responsible for the proposition Wagers made at a craps table.
- (4) Boxperson shall be the first level Supervisor assigned the responsibility of directly participating in and supervising the operation and conduct of a craps table.
- (5) Floorperson shall be the second level Supervisor assigned the responsibility for directly supervising the operation and conduct of a craps table, and the first level Supervisor assigned the responsibility for directly

supervising the operation and conduct of all other Gaming Tables.

- (6) Pit manager shall be the third level Supervisor assigned the responsibility for the overall supervision of the operation and conduct of a craps table and the second level Supervisor assigned the responsibility for the overall supervision of the operation and conduct of all other Gaming Tables.
 - (7) Shift manager shall be the Supervisor assigned to each Shift with the responsibility for the supervision of the conduct of all other Gaming Tables.
- (c) The Nation Gaming Operation shall maintain the following minimum levels of staffing:
- (1) One clerk shall be assigned to the entire Gaming Facility;
 - (2) One Dealer shall be assigned to each Gaming Table;
 - (3) Three Dealers shall be assigned to each craps table and baccarat table;
 - (4) One Boyperson shall be assigned to each craps table;
 - (5) One floorperson shall supervise:
 - a. Not more than one (1) baccarat or two (2) pai gow tables;
 - b. Not more than two (2) craps tables; or

- c. Not more than four (4) other Gaming Tables.
- (6) One Pit manager shall supervise not more than sixteen (16) Gaming Tables.
- (d) Notwithstanding the provisions of subdivision (c) above, the Nation Gaming Operation may, with the written approval of the SGA, implement a plan for revised supervision by floorpersons or Pit managers. The SGA shall promptly provide the SGO with any such written approval. In any plan for revised supervision:
 - (1) one floorperson may supervise not more than six (6) non-craps or non-baccarat Gaming Tables; and
 - (2) One Pit manager may supervise not more than twenty-four (24) Gaming Tables.
- (e) The Gaming Facility Manager or Shift manager shall notify, in writing, the SGA no later than twenty-four (24) hours in advance of implementing or changing any plan for revised supervision, provided, however, that notice may be provided less than twenty-four (24) hours in advance in circumstances which are emergency or could otherwise not reasonably be anticipated. Such notice shall include, without limitation, the following information:
 - (1) The Pit number and configuration of any Pit affected;
 - (2) The type, location and table number of any Gaming Table affected;
 - (3) The standard staffing level required for the Gaming Tables and the proposed variance therefrom;

- (4) The start date and time, and the duration, of the revised supervision; and
- (5) The basis for the decision to revise the number of Supervisory personnel, which shall include any relevant factors which demonstrate that proper operation and effective supervision of the affected Gaming Tables will be maintained, including, as applicable, a showing:
 - a. That the revised supervision is justified by a reduced volume of play at the specified times and Gaming Tables in the Gaming Facility;
 - b. That the particular Dealers or Supervisors assigned to the affected tables possess a degree of skill and experience indicative of sufficient ability to operate the affected tables with revised supervision, in which case a record of the personnel assigned to such tables during the period of revised supervision shall be maintained;
 - c. That a reduced number of Gaming Tables will be operating in the affected Pits; which are in a configuration to ensure proper supervision and operation; or
 - d. Any other facts or circumstances which establish that a revision in the number of Supervisory personnel is appropriate.
- (f) The SGA may, at any time upon twelve (12) hours notice, direct that the plan for revised supervision shall be terminated and

that the Nation Gaming Operation shall maintain standard staffing levels as defined in subdivision (c) above. The SGA shall promptly inform the SGO of any such action.

(g) The following personnel shall be used to maintain and operate the Gaming Devices and bill changers in an establishment:

1. Slot mechanics shall be the persons assigned the responsibility for repairing and maintaining Gaming Devices and bill changers in proper operating condition and participating in the filling of Payout reserve containers.
2. Slot attendants shall be the persons assigned the responsibility for the operation of Gaming Devices and bill changers, including, but not limited to, participating in annual Jackpot Payouts and filling Payout reserve containers. At the discretion of the Nation Gaming Operation, slot attendants may also accept currency and coupons from patrons in exchange for currency obtained from an imprest fund issued by the cashier's cage, the master coin bank or a slot booth in accordance with internal control procedures.
3. Slot Supervisors shall be the first level Supervisors assigned the responsibility for directly supervising the operation of Gaming Devices and bill changers.
4. Slot Shift manager shall be the second level Supervisor with the responsibility for the overall supervision of the Gaming Device and bill changer operation for each Shift.
5. If the Nation Gaming Operation chooses to establish an

independent slot department, the slot department manager shall be the executive assigned the responsibility and authority for the supervision and management of the overall operation of the Nation Gaming Operation's Gaming Devices and bill changers including, without limitation, the hiring and terminating of all slot department personnel and the creation of high employee morale and good customer relations, all in accordance with the policies and practices established by the Nation Gaming Operation's board of directors or non-corporate equivalent. In the absence of the slot department manager, the slot Shift manager shall have the authority of the slot department manager.

(h) Notwithstanding the foregoing, the following personnel, at a minimum, shall be used at keno:

(1) Keno writer shall be the person assigned the responsibility to generate keno tickets, redeem promotional coupons, accept Wagers and issue Keno Payouts at a keno booth, roving keno work station or satellite keno booth.

(2) Keno Shift Supervisor shall be the Supervisor assigned to each Shift with the responsibility for directly supervising all activities at a keno booth, roving keno work stations and satellite keno booths.

(i) Nothing in this section shall be construed to limit the Nation Gaming Operation from utilizing personnel in addition to those described herein, nor shall anything in this section be construed to limit the discretion of the SGA to order the utilization of additional personnel by the Nation Gaming

Operation necessary for the proper conduct and effective supervision of the Nation Gaming Operation.

9. Table inventories

- (a) Whenever a Gaming Table in the Gaming Facility is opened for gaming, operations shall commence with an amount of gaming Chips and coins to be known as the "table inventory" and the Nator. Gaming Operation or management contractor shall not cause or permit gaming Chips or coins to be added to, or removed from, such table inventory during the gaming day except:
- (1) In exchange for Cash, promotional coupons, issuance copies of Counter Checks presented by patrons in conformity with the applicable sections of the Compact or its Appendices;
 - (2) In payment of winning Wagers and collection of losing Wagers made at such Gaming Table;
 - (3) In exchange for gaming Chips received from a patron having an equal aggregate face value;
 - (4) In conformity with the Fill and Credit Slip procedures as contained in the Compact or its Appendices;
 - (5) Coin may be used for the purpose of marking baccarat Vigorish;
 - (6) In conformity with a table inventory return device utilized in the game of Caribbean Stud Poker, the gaming Chips wagered on the progressive Payout shall always be placed in the table inventory container; and
 - (7) Gaming Chips placed on or in the wagering devices utilized for the optional bonus Wager in the game of Let It Ride

Poker, shall always be placed in the table inventory container.

- (b) Whenever a Gaming Table is not open for gaming activity, the table inventory and the Table Inventory Slip prepared in conformity with the procedures set forth in this Appendix shall be stored in a separate, locked clear container which shall be clearly marked on the outside with the game and the Gaming Table number to which it corresponds. The information on the Table Inventory Slip shall be visible from the outside of the container. All containers shall be stored either in the cashier's cage or secured to the Gaming Table, provided that there is adequate security, as approved in writing, by the SGA.
- (c) The keys to the locked containers containing the table inventories shall be maintained and controlled by the Gaming Facility Department in a secure place approved, in writing by the SGA, and shall at no time be made accessible to any cashier's cage personnel or to any person responsible for transporting such table inventories to or from the Gaming Tables.

10. Opening tables for gaming

- (a) Whenever Gaming Tables are to be opened for gaming activity, the locked container with the table inventory and the Table Inventory Slip, if not already attached to the Gaming Tables, shall be transported directly from the cashier's cage to the Gaming Table by a Security Department Member.
- (b) Immediately prior to opening the Gaming Table for gaming, the Gaming Facility Supervisor assigned to such table shall unlock the container after verifying that it is the proper container for that table by matching the table number affixed to the container with the table number affixed to the Gaming Table.
- (c) The Dealer or Boxperson assigned to the Gaming Table shall count the contents of the container in the presence of the Gaming Facility Supervisor assigned to such table and shall agree the Count to the Opener removed from the container.
- (d) Signatures attesting to the accuracy of the information recorded on the Opener shall be placed on such Opener by the Dealer or Boxperson assigned to the table and the Gaming Facility Supervisor that observed the Dealer or Boxperson count the contents of the container.
- (e) Any discrepancy between the amount of gaming Chips and/or coins counted and the amount of the gaming Chips and/or coins recorded on the Opener shall be immediately reported to the Gaming Facility Manager, assistant Gaming Facility Manager, or Gaming Facility Shift manager in charge at such time, the security department and SGA Inspectors, orally. The Pit personnel shall fill out a table discrepancy form, put one copy in the Drop Box

and one copy shall be provided to SGA, with a copy to the SGO. The Security Department Member shall then complete the standard security report in a format approved in writing by the SGA and shall immediately forward a copy of such report to an SGA Inspector, with a copy to the SGO.

- (f) After the Count of the contents of the container and the signing of the Opener, such slip shall be immediately deposited in the Drop Box attached to the Gaming Table by the Dealer or Boxperson after the opening of such table.

11. Shift changes at Gaming Tables

- (a) Whenever Gaming Tables are to remain open for gaming activity at the conclusion of a Shift, the gaming Chips and coins remaining at the Gaming Tables at the time of the Shift change shall be counted by either the Dealer or Boxberson assigned to the outgoing Shift and the Dealer or Boxberson assigned to the incoming Shift, or the Dealer or Boxberson assigned to the Gaming Table at the time of a Drop Box Shift change which does not necessarily coincide with an employee Shift change. The Count shall be observed by the Gaming Facility Supervisor assigned to the Gaming Table of the outgoing Shift, or the Gaming Facility Supervisor assigned to the Gaming Table at the time of the Drop Box Shift change.
- (b) The gaming Chips and coins counted shall be recorded on Table Inventory Slips by the Gaming Facility Supervisor assigned to the Gaming Table of the outgoing Shift, or the Gaming Facility Supervisor assigned to the Gaming Table at the time of a Drop Box Shift change.
- (c) Table Inventory Slips shall be two-part forms, at a minimum, and on the original of the slip (Closer) and the duplicate of the slip (Opener), the Gaming Facility Supervisor shall record the following:
 - (1) The date and identification of the Shift ended;
 - (2) The game and table number;
 - (3) The total value of each denomination of gaming Chips and coins remaining at the Gaming Table; and

- (4) The total value of all denominations of gaming Chips and coins remaining at the Gaming Table.
- (d) Signatures attesting to the accuracy of the information recorded on the Table Inventory Slips shall be of either the Dealer or Boxperson and the Gaming Facility Supervisor assigned to the incoming and the outgoing Shifts, or the Dealer or Boxperson and the Gaming Facility Supervisor assigned to the Gaming Tables at the time of a Drop Box Shift change. Immediately adjacent to each signature required under this section, the signer shall write their gaming license number.
- (e) Upon meeting the signature requirements as described in subdivision (d) above, the Closer shall be deposited in the Drop Box that is attached to the Gaming Table immediately prior to the change of Shift or the Drop Box Shift change and the Opener shall be deposited in Drop Box that is attached to the Gaming Table immediately following the change of Shift or Drop Box Shift change.

12. Closing of Gaming Tables

- (a) Whenever gaming activity at a Gaming Table is concluded, the gaming Chips and coins remaining at the Gaming Table shall be counted by the Dealer or Boxperson assigned to the Gaming Table and observed by a Gaming Facility Supervisor assigned to the Gaming Table.
- (b) The gaming Chips and coins counted shall be recorded on a Table Inventory Slip by the Gaming Facility Supervisor assigned to the Gaming Table.
- (c) The Table Inventory Slips shall be two-part forms, at a minimum, and on the original copy of the slip (Closer) and the duplicate of the slip (Opener), the Gaming Facility Supervisor shall record the following:
 - (1) The date and identification of the Shift ended;
 - (2) The game and table number;
 - (3) The total value of each denomination of gaming Chips and coins remaining at the Gaming Table; and
 - (4) The total value of all denominations of gaming Chips and coins remaining at the Gaming Table.
- (d) Signatures attesting to the accuracy of the information recorded on the Table Inventory Slips at the time of closing Gaming Tables shall be of the Dealer or Boxperson and the Gaming Facility Supervisor assigned to the Gaming Table who observed the Dealer or Boxperson count the contents of the Table

Inventory. Immediately adjacent to each signature required under this section, the signer shall write their gaming license number.

- (e) Upon meeting the signature requirements described in subdivision (d) above, the Closer shall be deposited in the Drop Box attached to the Gaming Table immediately prior to the closing of the table.

- (f) Upon meeting the signature requirements described in subdivision (d) above, the Opener and the gaming Chips remaining at the table shall be placed in the container, after which the container shall be locked and either transported directly to the cashier's cage by a Security Department Member or secured to the Gaming Table, provided that there is adequate security, as approved in writing by the SGA. If the locked containers are transported to the cashier's cage, a cage cashier shall determine that all locked containers have been returned, or if the locked containers are secured to the Gaming Table, a Gaming Facility representative shall account for all the locked containers.

13. Distributing gaming Chips and coins to Gaming Tables

- (a) A Request for Fill (Request) shall be prepared by a Gaming Facility Supervisor, or a Gaming Facility clerk, to authorize the preparation of a Fill Slip (Fill) for the distribution of gaming Chips and coins to Gaming Tables. The Request shall be on at least a two-part form and access to the Request shall, prior to use, be restricted to Gaming Facility Supervisors and clerks.
- (b) The following information, at a minimum, shall be recorded on the original and duplicate Request:
 - (1) The date and time, and Shift, of preparation;
 - (2) The denomination of gaming Chips and/or coins to be distributed to the Gaming Tables;
 - (3) The total amount of each denomination of gaming Chips and/or coins to be distributed to the Gaming Tables;
 - (4) The game and table number to which the gaming Chips and/or coins are to be distributed; and
 - (5) The signature and gaming license number of the Gaming Facility Supervisor.
- (c) After preparation of the Request, the original copy of such Request shall be transported directly to the cashier's cage.
- (d) The duplicate copy of the Request shall be placed by the Dealer or Boyperson in public view on the Gaming Table to which the

gaming Chips and/or coins are to be received. Such duplicate Request shall not be removed until the Chips and/or coins are received at which time the Request and Fill shall be deposited in the Drop Box.

- (e) If Fills are computer prepared and the input data required for preparation of a Fill is entered by, and the ability to input such data is restricted to a Gaming Facility Supervisor and a Gaming Facility clerk, and the printing of the Fill, which shall be in the cashier's cage, is a direct result of such input, subdivisions (a), (b), (c), and (d) above, may be ignored.
- (f) A Fill shall be prepared by a Chip bank cashier or, if computer prepared, by a Chip bank cashier, a Gaming Facility Supervisor, or a Gaming Facility clerk whenever gaming Chips and/or coins are distributed to the Gaming Tables from the cashier's cage.
- (g) Fills shall be serially prenumbered forms, each series of Fills shall be used in sequential order, and the series numbers of all Fills received by the Nation Gaming Operation shall be accounted for by Nation Gaming Operation employees with no incompatible functions. All original and duplicate void Fills shall be marked "VOID" and shall require the signature and gaming license number of the preparer.
- (h) When fills are manually prepared, the following procedures and requirements shall be observed:
 - (1) Each series of Fills shall be a three-part form, at a minimum, and shall be inserted in a locked dispenser that will permit an individual slip in the series and its copies to be written upon simultaneously while still locked in the

dispensers, and that will discharge the original and duplicate while the triplicate remains in a continuous, unbroken form in the dispenser; and

- (2) Access to the triplicates shall be maintained and controlled at all times by Nation Gaming Operation employees responsible for controlling and accounting for the unused supply of Fills, placing Fills in the dispenser, and removing Fills from the dispensers each gaming day, the triplicates remaining therein. These employees shall have no incompatible functions.
- (i) When Fills are computer-prepared, each series of Fills shall be a two-part form, at a minimum, and shall be inserted in a printer that will: simultaneously print an original and a duplicate and store, in machine-readable form, all information printed on the original and duplicate. The stored data shall not be susceptible to change or removal by any personnel after preparation of a Fill.
- (j) On original, duplicate, and triplicate copies of the Fill, or in stored data, the preparer shall record, at a minimum, the following information:
 - (1) The denomination of the gaming Chips and/or coins being distributed;
 - (2) The total amount of each denomination of gaming Chips and/or coins being distributed;
 - (3) The total amount of all denominations of gaming Chips and/or coins being distributed;

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from the cashier of gaming Chips and coins to be transported;

- c. The Dealer or Boxperson assigned to the Gaming Table upon receipt at such table from the Security Department Member of gaming Chips and/or coins at such table; and
- d. The Gaming Facility Supervisor assigned to the Gaming Table upon receipt of the gaming Chips and coins at such table.

- (2) Each person required to provide a signature attesting to the accuracy of the information contained on the Fills shall also provide their respective gaming license number next to their signature.
- (n) Upon meeting the signature requirements as described in subdivision (m) above, the Security Department Member that transported the gaming Chips and/or coins and the original and duplicate copies of the Fill to the table shall observe the immediate deposit by the Dealer or Boxperson of the duplicate Fill and the duplicate Request into the Drop Box attached to the Gaming Table to which the gaming Chips and/or coins were transported, and return or observe the return of the original Fill to the Chip bank where the original Fill and Request shall be maintained together, and controlled by, Nation Gaming Operation employees independent of the Gaming Facility Department.
- (o) The original and duplicate void Fills, the original Request, and the original Fill, maintained and controlled in conformity with

subdivision (n) above, shall be forwarded using one of the following alternatives:

- (1) Alternative I: Forwarded to the Count team for agreement with the duplicate Fill and duplicate Request removed from the Drop Box, after which the original and duplicate Request and the original and duplicate Fill shall be forwarded to the Accounting Department for agreement, On a Daily Basis, with the triplicate or stored data.
- (2) Alternative II: Forwarded to the Accounting Department for agreement, On a Daily Basis, with the duplicate Fill and duplicate Request removed from the Drop Box and with the triplicate or stored data.

14. Removing gaming Chips and coins from Gaming Tables

- (a) A Request for Credit (Request) shall be prepared by a Gaming Facility Supervisor, or a Gaming Facility clerk, to authorize the preparation of a Credit Slip (Credit) for the removal of gaming Chips and/or coins from Gaming Tables to the cashier's cage. The Request shall be a two-part form, at a minimum, and access to such form shall, prior to use, be restricted to Gaming Facility Supervisors and clerks.
- (b) On the original and the duplicate Request, the following information, at a minimum, shall be recorded:
 - (1) The date, time, and Shift, of preparation;
 - (2) The denomination of gaming Chips and/or coins to be removed from the Gaming Table;
 - (3) The total amount of each denomination of gaming Chips and/or coins to be removed from the Gaming Table;
 - (4) The game and table number from which the gaming Chips and/or coins are to be removed; and
 - (5) The signature and gaming license number of the Gaming Facility Supervisor and Dealer or Boxperson assigned to the Gaming Table from which the gaming Chips and/or coins are to be removed.
- (c) Immediately upon preparation of a Request and transfer of gaming Chips and/or coins to a Security Department Member, a Gaming Facility Supervisor shall have recorded on the duplicate Request

the signature and gaming license number of the Security Department Member to which the gaming Chips and/or coins were transferred, and the Dealer or Boxperson shall place the duplicate Request in public view on the Gaming Table from which the gaming Chips and/or coins were removed, and such Request shall not be removed until a Credit is received from the Chip bank at which time the Request and the Credit shall be deposited in the Drop Box.

- (d) The original Request shall be transported directly to the cashier's cage by the Security Department Member along with the gaming Chips and/or coins removed from the Gaming Table.
- (e) A Credit shall be prepared by a Chip bank cashier or, if computer prepared, by a Chip bank cashier, a Gaming Facility Supervisor, or a Gaming Facility clerk whenever gaming Chips and/or coins are returned from the Gaming Tables to the cashier's cage.
- (f) Credits shall be serially prenumbered forms, each series of Credits shall be used in sequential order, and the series numbers of all Credits received by the Nation Gaming Operation shall be accounted for by employees with no incompatible functions. All original and duplicate void Credits shall be marked "VOID" and shall require the signature and gaming license number of the preparer.
- (g) When Credits are manually prepared, the following procedures and requirements shall be observed:
 - (l) Each series of Credits shall be a three-part form, at a minimum, and shall be inserted in a locked dispenser that

will permit an individual slip in the series and ics copies to be written upon simultaneously, while still locked in the dispenser, and that will discharge the original and duplicate while the triplicate remains in a continuous, unbroken form in the dispenser; and

- (2) Access to the triplicates shall be maintained and controlled at all times by Nation Gaming Operation employees responsible for controlling and accounting for the unused supply of Credits, placing Credits in the dispensers, and removing credits from the dispensers, each gaming day, the triplicates remaining therein. These employees shall have no incompatible functions.
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- (h) When credits are computer prepared, each series of Credits shall be a two-part form, at a minimum, and shall be inserted in a printer that will simultaneously print an original and a duplicate and store, in machine-readable form, all information printed on the original and duplicate, and discharge in the cashier's cage the original and duplicate. The stored data shall not be susceptible to change or removal by any personnel after preparation of a Credit.
 - (i) On originals, duplicates, and triplicates, or in stored data, the preparer shall record, at a minimum, information: the following
 - (1) The denomination of the gaming Chips and/or coins being returned;
 - (2) The total amount of each denomination of gaming Chips and/or coins being returned;

- (3) The total amount of all denominations of gaming Chips and/or coins being returned;
 - (4) The game and table number from which the gaming Chips and/or coins are being returned;
 - (5) The date, time and Shift during which the removal of gaming Chips and/or coins occurs; and
 - (6) The signature and gaming number of the preparer or, if computer prepared, the identification code and gaming license number of the preparer.
- (j) The time of preparation of the Credit shall be recorded, at a minimum, on the original and duplicate upon preparation.
- (k) Signatures attesting to the accuracy of the information contained on the Credits shall be, at a minimum, of the following personnel at the following times:
- (1) The original and the duplicate:
 - a. The Chip bank cashier upon preparation;
 - b. The Security Department Member returning the gaming Chips and/or coins to the cashier's cage;
 - c. The Dealer or Boxperson assigned to the Gaming Table, upon receipt at such table from the Security Department Member; and
 - d. The Gaming Facility Supervisor assigned to the Gaming

Table upon receipt at such table.

- (2) Each person required to provide a signature attesting to the accuracy of the information contained on the Fills shall also provide their respective gaming license number next to their signature.
- (1) Upon meeting the signature requirements as described in subdivision (k) above, the Security Department Member returning the original and duplicate copies of the Credit to the Gaming Table or the Pit Clerk receiving the original and duplicate copies of the Credit at the Gaming Table shall observe the immediate deposit by the Dealer or Boxperson of the duplicate Credit and Request in the Drop Box attached to the Gaming Table from which the gaming Chips and/ or coins were removed. The Security Department Member or the Pit Clerk shall expeditiously return the original Credit to the Chip bank where the original Credit and Request shall be maintained and controlled by Nation Gaming Operation employees independent of the Gaming Facility Department.
- (m) The original and duplicate of void Credits and the original Request and Credit, maintained and controlled in conformity with subdivision (1) above, shall be forwarded using one of the following alternatives:
 - (1) Alternative I: Forwarded to the Count team for agreement with the duplicate Credit and the duplicate Request removed from the Drop Box, after which the Requests and the original and duplicate Credit shall be forwarded to the Accounting Department for agreement, On a Daily Basis, with the triplicate or stored data.

- (2) Alternative II: Forwarded to the Accounting Department for agreement, On a Daily Basis, with the duplicate Credit and the Request removed from the Drop Box and the triplicate or stored data.

15. Count Room; characteristics

- (a) The Nation Gaming Operation shall have immediately adjacent to the cashier's cage a room, to be known as the "Count Room," specifically designated, designed and used exclusively for counting the contents of Drop Boxes, Slot Cash Storage Boxes, slot Drop Boxes and slot drop buckets.
- (b) The Count Room shall be designed and constructed to provide maximum security for the materials housed therein and for the activities conducted therein. The SGA shall approve in writing the design and construction of a Count Room with, at a minimum, the following security measures:
 - (1) A metal door installed on each entrance and exit;
 - (2) Each entrance and exit door shall be equipped with:
 - a. Two separately keyed locks;
 - b. An alarm device, approved in writing by the SGA, which audibly signals the Surveillance Department and the security department whenever a door to the Count Room is opened; and
 - c. A light system, approved in writing by the SGA, which illuminates one or more lights in the monitoring rooms, at each Count Room door, and at such other locations as the SGA may require, for purposes of maintaining constant surveillance;
 - (3) Each lock required by subparagraph (b) (2) (a) above shall be

controlled by a key which is different from:

- a. The key to the other lock on that door;
 - b. The keys to the locks securing the contents of each Drop Box, Slot Cash Storage Box and slot Drop Box; and
 - c. The keys to the locks of each slot drop bucket compartment.
- (4) The key to one of the locks required by subparagraph (b) (2) (a) above shall be maintained and controlled by the security department in a secure area within the security department, access to which may be gained only by a security department Supervisor, and the key to the other lock shall be maintained and controlled by the SGA; and
- (5) The security department shall establish an internal control procedure approved in writing by the SGA regarding the signing-out of all keys removed from the security department.
- (c) Located within the Count Room shall be:
- (1) A table constructed of clear glass or similarly clear material used for the emptying, counting, and recording of the contents of Drop Boxes and Slot Cash Storage Boxes which shall be known as the "Count table";
 - (2) Closed circuit television cameras and microphone wired to the Surveillance Department capable of, but not limited to,

the following:

- a. Effective and detailed audio-video monitoring and recording of the entire Count process; and
- b. Effective, detailed video-monitoring and recording of the interior of the Count Room, including storage cabinets or trolleys used to store Drop Boxes and Drop Boxes;

The Nation Gaming Operation may count the contents of slot drop buckets and slot Drop Boxes in a different room, to be known as the "hard Count Room" from that used for counting the contents of Drop Boxes and Slot Cash Storage Boxes, in which event the latter room shall be known as the "soft Count Room." In all other respects the hard Count Room shall comply with the requirements of this section, except that the hard Count Room need not contain the audio equipment required above. In addition, the hard Count Room shall contain a fixed-door type or hand-held metal detector to inspect all persons exiting the hard Count Room.

In addition to the light system required by subparagraph {bl {2) (cl above, each hard Count Room shall contain a separate light system or other device approved in writing by the SGA which shall provide a continuous visual signal at the Count Room door and other locations as the SGA may require whenever any access door to the Count Room is open while the system is activated. The light system or device shall:

1. Maintain the visual signal until the system is reset

or deactivated; and

2. Be designed so as to permit its activation, deactivation or resetting only by the SGA.

16. Gaming Table Drop Boxes and Slot Cash Storage Boxes

- (a) Each Gaming Table in the Nation Gaming Operation shall have attached to it a secure metal container known as a "Drop Box" in which shall be deposited all Cash, promotional coupons exchanged at the Gaming Table for gaming Chips, Match Game Coupons, issuance copies of Counter Checks exchanged at the Gaming Table for gaming Chips as part of credit, duplicate Fill and Credit Slips, Requests for Credit forms, Requests for Fill forms, and Table Inventory forms. Each Drop Box shall have, at a minimum:
- (1) Two separate locks securing the contents placed into the Drop Box, the keys to which shall be different from each other;
 - (2) A separate lock securing the Drop Box to the Gaming Table, the key to which shall be different from each of the keys to locks securing the contents of the Drop Box;
 - (3) A slot opening through which currency, coins, promotional coupons, forms, records, and documents can be inserted into the Drop Box;
 - (4) A mechanical device that will automatically close and lock the slot opening upon removal of the Drop Box from the Gaming Table; and
 - (5) Permanently imprinted or impressed thereon, and clearly visible, a number corresponding to a permanent number on the Gaming Table to which it is attached, and a marking to indicate game and Shift, except that emergency Drop Boxes may be maintained without such number or marking, provided

the word "emergency" is permanently imprinted or impressed thereon and, when put into use, are temporarily marked with the number of the Gaming Table and identification of the game and Shift, and provided further, that the Nation Gaming Operation obtains the express written approval of the SGA before placing an emergency Drop Box into use.

- (b) Each bill changer in the Nation Gaming Operation shall have contained in it a secure metal container known as a "Slot Cash Storage Box," in which shall be deposited all Cash and coupons inserted into the bill changer. Each Slot Cash Storage Box shall:
- (1) Have two separate locks securing the contents of the Slot Cash Storage Box, the keys to which shall be different from each other, and shall comply with the requirements herein;
 - (2) Have a slot opening through which currency and coupons can be inserted into the Slot Cash Storage Box;
 - (3) Have a mechanical arrangement or device that prohibits removal of currency and coupons from the slot opening whenever the Slot Cash Storage Box is removed from the bill changer;
 - (4) Be fully enclosed, except for such openings as may be required for the operation of the bill changer or the Slot Cash Storage Box; provided, however, that the location and size of such openings shall not affect the security of the Slot Cash Storage Box, its contents or the bill changer, and shall be approved in writing by the SGA; and

(5) Have an asset number that is permanently imprinted, affixed or impressed on the outside of the Slot Cash Storage Box which corresponds to the asset number of the Gaming Device to which the bill changer has been attached. In lieu of the asset number, the Nation Gaming Operation may develop and maintain, with prior SGA written approval, a system for assigning a unique identification number to its Slot Cash Storage Boxes, which system ensures that each Slot Cash Storage Box can readily be identified, either manually or by computer, when in use with, attached to, and removed from a particular bill changer. Each such unique identification number shall be permanently imprinted, affixed or impressed on the outside of each Slot Cash Storage Box that does not otherwise bear an asset number. The asset number or unique identification number must be conspicuous and clearly visible to persons involved in removing or replacing the Slot Cash Storage Box in the bill changer and through the closed circuit camera coverage system. The size and location of the asset number or unique identification number are subject to prior written approval by the SGA. Notwithstanding the foregoing, emergency Slot Cash Storage Boxes may be maintained without such numbers, provided the word "emergency" is permanently imprinted, affixed or impressed thereon, and when put into use, are temporarily marked with the asset number of the Gaming Device to which the bill changer is attached, and provided further that the express written approval of the SGA is obtained before placing an emergency Slot Cash Storage Box into use.

(c) The key utilized to unlock the Drop Boxes from the Gaming Table shall be maintained and controlled by the security department.

- (d) The key to one of the locks securing the contents of a Drop Box and to one of the locks securing the contents of a Slot Cash Storage Box shall be maintained and controlled by the Accounting Department. The key to the second lock securing the contents of the Drop Boxes and Slot Cash Storage Boxes shall be maintained and controlled by the SGA.

- (e) Notwithstanding subparagraph (a) (5) above, the Nation Gaming Operation may utilize Drop Boxes which do not indicate the Shift thereon, if the Nation Gaming Operation does not intend to collect all Drop Boxes each gaming day and has SGA approved internal control procedures regarding such.

17. Transportation to and from Gaming Tables of Drop Boxes; Slot Cash Storage Boxes, transportation to and from bill changers; storage

- (a) The Nation Gaming Operation shall place on file with the SGA, with a copy to SGO, a schedule setting forth the specific times at which the Drop Boxes will be brought to or removed from the Gaming Tables and Slot Cash Storage Boxes will be brought to or removed from the bill changers. The Nation Gaming Operation shall also maintain and make available to the SGA upon request the names and license numbers of all employees participating in the transportation of such Drop Boxes and Slot Cash Storage Boxes. No Drop Box shall be brought to or removed from any Gaming Table and no Slot Cash Storage Box shall be brought to or removed from any bill changer at other than the time specified in such schedule except with the express written approval of the SGA.
- (b) Except as otherwise provided in paragraph (b) (3) below, all Drop Boxes removed from Gaming Tables shall be transported directly to and secured in the Count Room by at least one Security Department Member.
 - (1) Upon its removal from a Gaming Table, a Drop Box shall be immediately placed in an enclosed trolley which shall be secured by two separately keyed locks. The key to one lock shall be maintained and controlled by the SGA. The key to the second lock shall be maintained and controlled by the security department in a secure location. Access to the security department's key shall be limited to Supervisors in that department and shall be controlled, at a minimum, by a sign-out and sign-in procedure approved in writing by

the SGA. The security department key shall be returned to its secure location immediately upon the completion of the collection and transportation of the Drop Boxes.

- (2) Prior to the movement of any trolley containing Drop Boxes from a gaming Pit, a Gaming Facility Department Supervisor shall verify in writing that the number of Drop Boxes being removed from the Pit equals the number of Drop Boxes that have been loaded on the trolley, and that the lock controlled by the security department has been locked. If a trolley is being transported from a gaming Pit to the Count Room, a Gaming Facility Department Supervisor shall also verify that the SGA lock on the trolley has been locked.
 - (3) A Drop Box being replaced by an emergency Drop Box shall be transported directly to and secured in the Count Room by at least one Security Department Member and one Gaming Facility Department Supervisor, and the use of a trolley shall not be required.
- (c) Except as provided in paragraph (c) (3) below, all Slot Cash Storage Boxes removed from bill changers shall be transported directly to and secured in the Count Room by, at a minimum, an SGA Inspector, a Security Department Member and a member of the Accounting Department or an independent Gaming Device cage department which may be created.
- (1) Upon its removal from a bill changer, a Slot Cash Storage Box shall be immediately placed in an enclosed trolley which shall be secured by two separately keyed locks. The key to one lock shall be maintained and controlled by the

SGA. The key to the second lock shall be maintained and controlled by the security department in a secure location. Access to the security department's key shall be limited to Supervisors in that department and shall be controlled, at a minimum, by a sign-out and sign-in procedure approved in writing by the SGA. The security department key shall be returned to its secure location immediately upon the completion of the collection and transportation of the Drop Boxes.

- (2) Prior to the movement of any trolley containing Slot Cash Storage Boxes from the Nation Gaming Operation floor into the Count Room, a key employee who is supervising the collection of the Slot Cash Storage Boxes (a "drop team Supervisor") shall verify in writing that the number of Slot Cash Storage Boxes being transported from the Nation Gaming Operation floor equals the number of Slot Cash Storage Boxes that have been scheduled to be collected that day. If a trolley is being transported from the Nation Gaming Operation floor to the Count Room, a drop team Supervisor shall also verify that the locks on the trolley have been locked.
- (3) A Slot Cash Storage Box being replaced by an emergency Slot Cash Storage Box, except as otherwise provided, shall be transported directly to and secured in the Count Room by at least one Security Department Member, one slot department or Cage Supervisor and one SGA Inspector, and the use of a trolley shall not be required.

(d) Except as provided for in subparagraph (e) below, all Drop Boxes not attached to a Gaming Table and all Slot Cash Storage Boxes

not contained in a bill changer, including emergency Drop Boxes and emergency Slot Cash Storage Boxes which are not actively in use, shall be stored in the Count Room or other secure area outside the Count Room approved in writing by the SGA, in an enclosed storage cabinet or trolley and secured in such cabinet or trolley by a separately keyed, double locking system. The key to one lock shall be maintained and controlled by the security department and the key to the second lock shall be maintained and controlled by the SGA. Access to the security department's key shall be limited to a Supervisor of that department.

- (e) Notwithstanding subdivision (d) above, the Supervisor of the security department may, immediately prior to the commencement of the Count process, issue the key to the storage cabinet or trolley to a Count Room Supervisor for the purpose of gaining access to the Drop Boxes and Slot Cash Storage Boxes to be counted. Any key removed from the security department shall be returned immediately following the conclusion of the Count of the Drop Boxes and Slot Cash Storage Boxes and the return of any empty emergency Drop Boxes and Slot Cash Storage Boxes to their respective storage cabinet or trolley, and the security department shall establish a sign-out and sign-in procedure approved by the SGA in writing for all such keys removed. The Gaming Facility Department which permits the security department key to be issued to a Count Room Supervisor shall establish internal control procedures, to be approved in writing by the SGA, governing the control over the key when soft Count takes a break.
- (f) Drop Boxes, when not in use during a Shift, may be stored on the Gaming Tables provided that there is adequate security as

approved in writing by the SGA. If adequate security can not be provided during this time, the Drop Boxes shall be stored as required in subdivision (d) above.

18. Patron request for voluntary suspension of credit privileges

- (a) Any person may voluntarily suspend his or her credit privileges at the Nation Gaming Operation by submitting a written request to the SGA in accordance with this section.
 - (1) Such request may be submitted in person at the offices of the SGA. Any person requesting suspension of credit privileges in person shall present valid identification credentials containing the person's signature and either a photograph or a general description of that person.
 - (2) Such request may also be submitted by mail addressed to the Executive Director of the SGA. Any request for suspension of credit privileges which is submitted by mail shall be signed before a notary public or other person empowered by law to take oaths and shall contain a certificate of acknowledgement by such notary public or other person attesting to the identity of the person making the request.
- (b) A request for suspension of credit privileges shall be in a form prescribed by the SGA, which shall include the following:
 - (1) The name of the person requesting suspension of credit privileges;
 - (2) The address of the person's residence;
 - (3) The person's date of birth;
 - (4) The signature of the person requesting suspension of credit privileges, indicating acknowledgment of the following

statement: "I certify that the information which I have provided above is true and accurate. I am aware that my signature below authorizes the SGA to suspend my credit privileges indefinitely from the date of this request, until such time as I submit a written request to the SGA for the reinstatement of any such credit privileges, provided such request is granted. Further, I authorize the SGA to send a copy of my request to each class III Gaming Facility located within the state.";

- (5) If the request for suspension of credit privileges is made in person:
 - a. The type of identification credentials examined containing the person's signature, and whether said credentials included a photograph or general description of the person; and
 - b. The signature and gaming license number of a SGA employee authorized to accept such request, indicating that the signature of the person requesting suspension of credit privileges appears to agree with that contained on his or her identification credentials, and that any physical description or photograph of the person appears to agree with his or her actual appearance; and
- (6) If the request for suspension of credit privileges is made by mail, a certificate of acknowledgment executed by a notary public or other person empowered by law to take oaths attesting to the identity of the person who is making the request for suspension of credit privileges.

- (c) The SGA shall maintain an updated master list of all persons who have requested suspension of credit privileges pursuant to this section, and shall notify the credit department in writing of any additions to, or deletions from, the list. The Nation Gaming Operation shall date and time stamp any such notice immediately upon receipt.
- (1) The Nation Gaming Operation shall suspend the credit privileges of any listed person, effective immediately upon receipt of notice that such person's name has been added to the list.
 - (2) An updated master list of persons who have requested suspension of credit privileges shall be maintained by the credit department of the Nation Gaming Operation.
 - (3) The Nation Gaming Operation shall note any suspension or reinstatement of credit privileges pursuant to this section in any existing credit file for the affected patron, including the following:
 - a. A copy of any applicable SGA notice of the suspension or reinstatement of credit privileges; and
 - b. The date, time, signature and gaming license number of the credit department representative making the suspension or reinstatement entry in the credit file.
- (d) Any person whose credit privileges have been suspended pursuant to this section may, no sooner than one hundred eighty (180) days after the request for suspension of credit privileges, request reinstatement of his or her credit privileges by

submitting a written request to the SGA in accordance with the procedures specified in paragraphs (a) (1) and (a) (2) above.

- (1) Such request shall be in a form prescribed by the SGA, which shall include the following:
 - a. The information specified in paragraphs (b) (1), (2), (3), and (4) above; and
 - b. The signature of the person requesting reinstatement of credit privileges, indicating acknowledgment of the following statement: "I certify that the information which I have provided above is true and accurate. I am aware that my signature below constitutes a revocation of my previous request for suspension of credit privileges, and authorizes the SGA to reinstate my credit privileges. Further, I authorize the SGA to, if approved, send a copy of my request for reinstatement of credit privileges to each class III Gaming Facility located within the State."
- (2) The SGA may require the applicant to present additional information supporting his or her reinstatement, in person.
- (3) The SGA may delete such person's name from the list established pursuant to subdivision (c) above, and so notify the credit department of the Nation Gaming Operation, no later than five (5) days from its receipt of the written request for reinstatement of credit privileges. The Nation Gaming Operation shall date and time stamp any such notice immediately upon receipt.

- (4) Upon receipt of notice that such person's name has been deleted from the list, the Nation Gaming Operation may reinstate such person's credit upon reverification of the information required for credit extension as required in this Appendix.

- (e) The Nation Gaming Operation shall not divulge that any person's name is designated on the master list, other than to authorized credit department employees or other Nation Gaming Operation personnel whose duties and functions require access to such information, the SGA and the SGO.

19. Patron request for voluntary exclusion from the Gaming Facility

- (a) Any person may voluntarily exclude themselves from the Nation Gaming Operation, under penalty of trespass upon violation, by submitting a written request to the SGA in accordance with this section.
 - (1) Such request may be submitted in person at the offices of the SGA. Any person requesting exclusion in person shall present valid identification credentials containing the person's signature and either a photograph or a general description of that person.
 - (2) Such request may also be submitted by mail addressed to the Executive Director of the SGA. Any request for exclusion which is submitted by mail shall be signed before a notary public or other person empowered by law to take oaths and shall contain a certificate of acknowledgment by such notary public or other person attesting to the identity of the person making the request.
- (b) A request for exclusion shall be in a form prescribed by the SGA, which shall include the following:
 - (1) The name of the person requesting exclusion;
 - (2) The address of the person's residence;
 - (3) The person's date of birth;
 - (4) The signature of the person requesting exclusion, indicating acknowledgment of the following statement: "I

certify that the information which I have provided above is true and accurate. I am aware that my signature below authorizes the SGA to authorize my exclusion indefinitely, until such time as I submit a written request to the SGA for the reinstatement of authority to be present in a Gaming Facility. I understand that if found within the Gaming Facility after having been excluded, I will be subject to arrest for criminal trespass. Further, I authorize the SGA to send a copy of my request to each class III Gaming Facility located within the State.";

- (5) If the request for exclusion is made in person:
 - a. The type of identification credentials examined containing the person's signature, and whether said credentials included a photograph or general description of the person; and
 - b. The signature and gaming license number of a SGA employee authorized to accept such request, indicating that the signature of the person requesting suspension of credit privileges appears to agree with that contained on his or her identification credentials, and that any physical description or photograph of the person appears to agree with his or her actual appearance; and
- (6) If the request for exclusion is made by mail, a certificate of acknowledgment executed by a notary public or other person empowered by law to take oaths attesting to the identity of the person who is making the request for exclusion.

- (c) Should the excluded patron be found within the Gaming Facility by the SGA, surveillance, security, credit, Gaming Facility Department or any gaming license holder of the Nation Gaming Operation, the law enforcement agency shall be immediately notified and requested to effectuate an arrest of the excluded patron for criminal trespass. Any employee of the Nation Gaming Operation, SGA, surveillance, security, credit, Gaming Facility Department shall be empowered to swear the complaint against the excluded patron.
- (d) The SGA shall maintain an updated master list of all persons who have requested exclusion pursuant to this section, and shall notify the surveillance, security, credit and Gaming Facility Departments in writing of any additions to, or deletions from, the list. The Nation Gaming Operation shall date and time stamp any such notice immediately upon receipt.
- (1) The Nation Gaming Operation shall exclude any listed person, effective immediately upon receipt of notice that such person's name has been added to the list.
 - (2) An updated master list of persons who have requested exclusion shall be maintained by the surveillance, security, credit and Gaming Facility Departments of the Nation Gaming Operation.
 - (3) The Nation Gaming Operation shall note any exclusion or reinstatement of gaming privileges pursuant to this section in a file for the affected patron, including the following:
 - a. A copy of any applicable SGA notice of the exclusion or reinstatement of gaming privileges; and

- b. The date, time, signature and gaming license number of the SGA representative making the exclusion or reinstatement entry in the patron's file.

Copies of all such materials required to be maintained in the patron's file shall be forwarded to the SGA weekly.

- (e) Any person whose has been excluded pursuant to this section may, no sooner than one (1) year after the request for exclusion, request reinstatement of his or her gaming privileges by submitting a written request to the SGA in accordance with the procedures specified in paragraphs (a) (1) and (a) (2) above.

- (1) Such request shall be in a form prescribed by the SGA, which shall include the following:

- a. The information specified in paragraphs (b) (1), (2), (3), and (4) above; and
- b. The signature of the person requesting reinstatement of gaming privileges, indicating acknowledgment of the following statement: "I certify that the information which I have provided above is true and accurate. I am aware that my signature below constitutes a revocation of my previous request for exclusion, and authorizes the SGA to reinstate my gaming privileges. Further, I authorize the SGA to, if approved, send a copy of my request for reinstatement of gaming privileges to each class III Gaming Facility located within the State."

- (2) The SGA may require the applicant to present additional

information supporting his or her reinstatement, in person.

- (3) The SGA may delete such person's name from the list established pursuant to subdivision (d) above, and so notify the surveillance, security, credit and Gaming Facility Department of the Nation Gaming Operation, no later than ten (10) days from its approval of the patron's request for reinstatement of gaming privileges.
- (4) Upon written notice of the SGA that such person's name has been deleted from the list, the Nation Gaming Operation may reinstate such person's gaming privileges.
- (f) The Nation Gaming Operation shall not divulge that any person's name is designated on the master list, other than to authorized surveillance, security or gaming facilities department employees or other Nation Gaming Operation personnel whose duties and functions require access to such information, the SGA.

20. Format of required signatures; record of signature exemplars

(a) Signatures shall:

(1) Comply with either of the following requirements:

- a. Be, at a minimum, the signer's first initial, last name and gaming license number, written by the signer, and be immediately adjacent to or above the clearly printed or preprinted title of the signer; or
- b. Be the employee's gaming license number or other computer identification code issued to the employee by the Nation Gaming Operation, if the document to be signed is authorized in writing by the SGA to be generated by computer, and such method of signature is approved or required in writing by the SGA;

(2) Signify that the signer has prepared forms, records, and documents and/or authorized, observed, and/or participated in a transaction to a sufficient extent to attest to the accuracy of the information recorded thereon, in conformity with this section and the Nation Gaming Operation's approved system of internal accounting control; and

(3) Signify that the signer required by this section to count or observe the counting of gaming Chips has counted or observed the Count of such Chips and such Count was made by breaking down stacks of Chips in accordance with the approved System of Internal Controls.

(b) Signature records shall be prepared for each person required by

the Compact or its Appendices, or other person identified in writing by the SGA, to sign records and documents and shall include specimens of signatures, titles of signers and the date the signature was obtained. Such signature records shall be filed alphabetically by last name either on a Nation Gaming Operation wide or departmental basis. The signature records shall be adjusted on a timely basis to reflect changes of personnel, or at such intervals determined in writing by the SGA.

- (c) Signature records shall be securely stored in the Accounting Department.
- (d) This section shall apply to any signature required in the Nation Gaming Operation's approved System of Internal Controls procedures and administrative and accounting controls.

21. Jobs compendium submission

- (a) The Nation Gaming Operation shall prepare and maintain a jobs compendium consistent with the requirements of this section detailing job descriptions and lines of authority for all personnel engaged in the operation of the Gaming Facility. Unless otherwise directed by the SGA, a jobs compendium shall be submitted to the SGA for approval at least thirty (30) days prior to the projected date of the commencement of Class III Gaming operations. The SGA shall review the jobs compendium and shall determine whether the job descriptions and tables of organization contained therein conform to the standards of this section. If the SGA find any insufficiencies, they shall, in writing, specify the same to the Nation Gaming Operation or management contractor registrant, which shall make appropriate alterations. When the SGA determine the submission to be adequate with respect to these standards, it shall notify the Nation Gaming Operation of such in writing. The Nation Gaming Operation shall not commence Class III Gaming operations unless and until its jobs compendium is approved in writing by the SGA.

- (b) A jobs compendium shall include the following sections, in the order listed:
 - (1) An alphabetical table of contents listing the position title and job code for each job description included in subdivision (b) (3), below, and the page number on which the corresponding job description may be found;

 - (2) A table of organization for each department and division, including all positions regardless of whether the positions require an gaming license, and illustrating, by position

title, direct and indirect lines of authority within the department or division. Each page of a table of organization shall specify the following:

- a. The date of its submission;
 - b. The date of the previously submitted table of organization which it supersedes; and
 - c. A unique title or other identifying designation for that table of organization.
- (3) A description of each employee position which accurately corresponds to the position title as listed in the table of organization and in the alphabetical table of contents. Each position description shall be contained on a separate page, organized by departments or divisions, and shall include, at a minimum, the following:
- a. Position title and corresponding department;
 - b. Salary range;
 - c. Job duties and responsibilities;
 - d. Detailed descriptions of experiential or educational requirements;
 - e. Projected number of employees in the position;
 - f. Proposed gaming license rank consistent with the Compact and its Appendices;

sections of the jobs compendium previously approved by the SGA.

- (d) The Nation Gaming Operation shall not be required to comply with the filing requirements of subdivision (c) above for amendments to job descriptions for positions which do not require an gaming license;
- (e) Notwithstanding any other requirement of this section, the Nation Gaming Operation or management contractor shall submit a complete and up-to-date jobs compendium in accordance with subdivision (a) above to the SGA, with a copy to the SGO, eighteen (18) months after commencement of gaming and every two (2) years thereafter, unless otherwise directed by the SGA.
- (f) The Nation Gaming Operation or management contractor (or applicant) shall maintain on its premises a complete, updated copy of its jobs compendium which shall be made available for review upon the request of the SGA.
- (g) Whenever required by this section, the Nation Gaming Operation shall file three (3) copies of a jobs compendium and three (3) copies of an amendment to a jobs compendium with the SGA. Each copy shall be in a format prescribed in writing by the SGA, including a cover indicating the date of the submission and the label "Jobs Compendium Submission" or "Jobs Compendium Amendment" as appropriate.
- (h) The Nation Gaming Operation or management contractor shall submit to the SGA a list of employees who have received Compensation of one hundred thousand dollars (\$100,000.00) or more, including salary, bonuses, incentives, profit sharing or

any other Compensation as indicated on the employees' annual Internal Revenue Service Form W-2. Such list shall be submitted to the SGA by March 31 for the preceding tax year and shall include the following for each employee listed:

- (1) The name of the employee;
 - (2) The gaming license number;
 - (3) The position of the employee and the corresponding job code for such position;
 - (4) The total amount of Compensation received by the employee; and
 - (5) Each form of Compensation received, such as salary, bonuses, incentives or profit sharing, and the amount thereof.
- (i) No provision of this section shall be construed so as to limit the Nation Gaming Operation's or management contractor's discretion in utilizing a particular job title for any position in its jobs compendium.

22. Reserve sets of gaming Chips

- (a) Unless otherwise authorized in writing by the SGA, for each set of value gaming Chips that the Nation Gaming Operation elects to issue in a denomination of twenty-five dollars (\$25.00), one hundred dollars (\$100.00) or five hundred dollars (\$500.00), it shall also have at least one approved reserve set of gaming Chips that may be used as a back-up for the set of gaming Chips in active use. Each reserve set of Value Chips maintained for use by the Nation Gaming Operation shall have different secondary colors than the primary set of value gaming Chips.
- (b) The Nation Gaming Operation shall also have a reserve Non-Value Chip for each color utilized in the Gaming Facility, with a design insert or symbol different from those Non-Value Chips comprising the primary set.
- (c) The Nation Gaming Operation shall remove the primary set of gaming Chips in use from active play whenever it is believed the Gaming Facility is taking on Counterfeit Chips or whenever any other impropriety or defect in the utilization of that set of Chips makes removal of the Chips in active use necessary or whenever the SGA so direct in writing. An approved reserve set of Value Chips and a reserve Non-Value Chip shall be placed into active play whenever the primary set is removed.
- (d) Whenever the Chips in active use are removed from play, the Nation Gaming Operation shall immediately notify a representative of the SGA of this fact and the reasons for such occurrence. The SGA shall promptly notify the SGO of such occurrence.

- (e) Notwithstanding subdivision (a) above, the Nation Gaming Operation may obtain written SGA approval to commingle two or more different samples within a single set of Value Chips from the same or different manufacturers for a particular denomination of Value Chip with a value of one hundred dollars (\$100.00) or less, provided that each sample of a particular denomination shall have the same secondary color and edge design. Any approved sample of a particular denomination of Value Chip within a single set of Chips may be placed in or removed from active use by the Nation Gaming Operation at any time.
- (f) Each set of gaming Chips that the SGA approves for use by the Nation Gaming Operation shall receive a unique and permanent alphabetical designation. This designation shall be assigned by the Nation Gaming Operation during the design schematic approval process and shall be used for all inventory procedures. If the Nation Gaming Operation elects to commingle gaming Chips pursuant to subdivision (e) above, in addition to the assigned alphabetical designation for that set of Chips, each different sample within the set shall also be assigned an accompanying unique numeric designation.

23. Emergency procedures

Before the Nation Gaming Operation has operated the Gaming Facility for one hundred twenty (120) days, the Nation Gaming Operation shall submit, to the SGA, with a copy to the SGO, an emergency action plan for the response to, and management of, fire and medical emergencies and natural disasters in all areas of the Gaming Facility and related enterprises. The plan shall include procedures for notification of the appropriate law enforcement, police, the fire department, or emergency medical personnel, and procedures for expedited and unimpeded access of the personnel into all areas of the Gaming Facility or related enterprise in the event of a fire, medical, or other emergency.

24. Accounting records

- (a) The Nation Gaming Operation shall maintain complete, accurate, legible, and permanent records of all transactions pertaining to its revenues and expenses, assets, liabilities, and equity in conformance with generally accepted accounting principles. The SGA may direct the Nation Gaming Operation to alter the manner in which the records are maintained if the Nation Gaming Operation's records are not in accordance with generally accepted accounting principles or if the records are not in sufficient detail.
- (b) The accounting records shall be maintained using a double entry system of accounting with transactions recorded on the accrual basis and supported by detailed subsidiary records.
- (c) The detailed subsidiary records shall include, at a minimum, all of the following:
 - (1) Detailed general ledger accounts identifying all revenue, expenses, assets, liabilities, and equity for the Nation Gaming Operation.
 - (2) A record of all investments, advances, loans, and accounts receivable balances due the Nation Gaming Operation.
 - (3) A record of all loans and other accounts payable by the Nation Gaming Operation.
 - (4) A record of all accounts receivable written off as uncollectible by the Nation Gaming Operation.

- (5) Journal entries prepared by The Nation Gaming Operation.
- (6) Records that identify Table Drop, Table Win, and percentage of Table Win to Table Drop for each live table game and records accumulated for each type of live table game by Shift or by another accounting period pre-approved in writing by the SGA.
- (7) Records which identify the handle, Payout, win amounts and percentages, theoretical win amounts and percentages, and differences between theoretical and actual win amounts and percentages, for each Gaming Device on a week-to-date, month-to-date, and year-to-date basis.
- (8) Records supporting the accumulation of the costs for complimentary services and items. A complimentary service or item provided to patrons in the normal course of a business shall be recorded at an amount based upon the full retail price normally charged for the service or item.
- (9) Records that identify the purchase, receipt, and destruction of gaming Chips and tokens from all sources.
- (10) Records required to fully comply with all the Federal financial record-keeping requirements enumerated in 31 Code of Federal Regulation part 103.
- (11) Records required by the Nation Gaming Operation's approved System of Internal Controls.
- (12) Work papers supporting the daily reconciliation of Cash accountability.

- (13) Other records that the SGA has required in writing to be maintained.

- (d) All accounting records shall be kept for a period not less than seven (7) years from their respective dates.

25. Standard financial and statistical reports; annual audit and other reports; Independent Certified Public Accountant

- (a) Standard financial and statistical records required to be submitted to the SGA
 - (1) The Nation Gaming Operation, unless specifically exempted in writing by the SGA, shall file with the SGA monthly, quarterly, and annual reports of financial and statistical data in a format prescribed by the SGA.
 - (2) The SGA shall periodically prescribe a set of standard reporting forms and instructions to be used in filing monthly, quarterly, and annual reports.
 - (3) The SGA shall prescribe a uniform chart of accounts, consistent with Compact Appendix F, which shall include account classifications, in order to ensure consistency, comparability, and appropriate disclosure of financial information. The prescribed chart of accounts shall be the minimum level of detail to be maintained for each accounting classification by the Nation Gaming Operation.
 - (4) Annual reports shall be based on a calendar year beginning January 1 and ending December 31, unless otherwise approved in writing by the SGA. Quarterly reports shall be based on the calendar quarters ending March 31, June 30, and September 30. Monthly reports shall be based on calendar months. Quarterly and monthly reports shall contain a cumulative year-to-date column in this rule to facilitate analysis.

- (5) Annual audited Financial Statements shall be prepared on a comparative basis for the current and prior fiscal year and shall present the financial position and results of operations in conformity with generally accepted accounting principles.
- (6) A report shall be addressed to the SGA and postmarked not later than the required filing date. The required filing dates are as follows:
 - a. A monthly report is due on the thirtieth calendar day of the following month.
 - b. A quarterly report is due on the fifteenth calendar day of the second month following the end of the each calendar quarter.
 - c. An annual report is due on the fifteenth calendar day of the third month following the end of each calendar year.
- (7) If there is a termination or suspension of a National Indian Gaming Commission-approved management contractor of the Nation Gaming Operation, a voluntary or involuntary change in such management contractor, or a material change in ownership of such management contractor, then the Nation Gaming Operation shall file an interim quarterly report as of the date the event occurs, unless the event has already been disclosed in a regular quarterly report, or unless otherwise exempted in writing by the SGA. The filing date shall be thirty (30) calendar days after the date the event occurs.

- (8) An adjustment that results from the quarterly audits shall be recorded in the accounting records. If an adjustment was not reflected in the Nation Gaming Operation's quarterly or annual reports and if the SGA concludes that the adjustment is significant, then a revised report may be required from the Nation Gaming Operation. The revised filing shall be due within thirty (30) calendar days after written notification to the Nation Gaming Operation.
 - (9) A delay in mailing, mail pickups, and postmarking is the responsibility of the Nation Gaming Operation.
- (b) Reports required to be submitted to the SGA
- (1) Management contractor financial condition report. (If applicable).
 - a. The SGA shall require annual audits of the financial condition of the National Indian Gaming Commission-approved management contractor's total operations. An Independent Certified Public Accountant shall perform the annual audits.
 - b. The annual audits shall be performed and presented in accordance with generally accepted accounting principles and contain the opinion of the Independent Certified Public Accountant as to its fair preparation and presentation in accordance with generally accepted accounting principles.
 - c. To assure the integrity of gaming and compliance with the Compact and its Appendices, the SGA may require a

special audit of the Nation Gaming Operation to be conducted by SGA personnel or an Independent Certified Public Accountant. The SGA shall establish the scope, procedures and reporting requirements of a special audit.

(2) Annual audited Financial Statements. Two (2) manually-signed copies of audited Financial Statements, together with any report thereon of the Nation Gaming Operation's Independent Certified Public Accountant shall be filed with the SGA not later than one hundred twenty (120) days following the end of the fiscal year.

(3) Annual compliance report

a. The SGA shall require an annual compliance report to be prepared by the Nation Gaming Operation and submitted in a manner and form prescribed by the SGA.

The annual compliance report shall address, at a minimum, all of the following areas:

1. Compliance with the Compact and its Appendices.
2. Compliance with applicable ordinances and agreements with other governmental authorities.
3. Compliance with the approved System of Internal Controls procedures, accounting procedures, credit procedures, dispute procedures, and SGA-imposed security and safety requirements.
4. A material deviation from the Nation Gaming

Operation's approved internal control procedures, accounting procedures, credit and dispute procedures, and required security and safety requirements.

5. Corrective action taken by the Nation Gaming Operation to resolve deficiencies observed in clauses (1) to (4) of this subparagraph.
 6. Other matters required by the SGA and the SGO to measure the Nation Gaming Operation's compliance with the Compact and its Appendices.
- b. The SGA shall determine the date of filing and the number of copies of audits or reports required under this paragraph. The audits or reports shall be received by the SGA or postmarked not later than the required filing date. Delays in mailing, mail pickups, and postmarking are the responsibility of the Nation Gaming Operation.
 - c. The Nation Gaming Operation shall bear the expense of preparing an audit which is required by this paragraph and which is performed by an Independent Certified Public Accountant. Qualified personnel of the Nation Gaming Operation shall prepare compliance reports and the Nation Gaming Operation.
 - d. The reporting year-end of the Nation Gaming Operation shall be December 31 unless otherwise approved, in writing, by the SGA.

- (c) Requirements of publicly traded management contractors. A National Indian Gaming Commission approved management contractor who is a public reporting company under the securities and exchange act of 1933 or 1934, 15 United States Code § 77 and 15 United States Code § 78 shall submit a copy of all reports required by the Securities and Exchange Commission to the SGA. The reports shall be due on the same filing dates as required by the Securities and Exchange Commission.

- (d) Resignation, dismissal or engagement of an Independent Certified Public Accountant. If the Independent Certified Public Accountant who was previously engaged to audit the Nation Gaming Operation's Financial Statements resigns or is dismissed as the Nation Gaming Operation's auditor, or another Independent Certified Public Accountant is engaged as auditor, the Nation Gaming Operation shall file a written report with the SGA within ten (10) days following the end of the month in which such event occurs, setting forth the following:
 - (1) The date of such resignation, dismissal, or engagement;

 - (2) Whether in connection with the audits of the two most recent years preceding such resignation, dismissal, or engagement there were any disagreements with the former Independent Certified Public Accountant on any matter of accounting principles or practices, Financial Statement disclosure, or auditing scope or procedure, which disagreements if not resolved to the satisfaction of the former Independent Certified Public Accountant would have caused him to make reference in connection with his report to the subject matter of the disagreement; including a description of each such disagreement. The disagreements

to be reported shall include those resolved and those not resolved;

- (3) Whether the former Independent Certified Public Accountant's report on the Financial Statements for any of the past two years contained an adverse opinion or disclaimer of opinion or was qualified. The nature of such adverse opinion, disclaimer of opinion, or qualification shall be described; and
- (4) The Nation Gaming Operation shall request the former Independent Certified Public Accountant to furnish to the Nation Gaming Operation a letter addressed to the SGA stating whether he or she agrees with the statements made by the Nation Gaming Operation in response to this subdivision.

26. Accounting controls for the cashier's cage, satellite cages, master coin bank and coin vaults

- (a) The assets for which the general cashiers are responsible shall be maintained on an Imprest Basis. At the end of each Shift, the cashiers assigned to the outgoing Shift shall record on a cashiers' Count Sheet the face value of each cage inventory item counted and the total of the opening and closing cage inventories and shall reconcile the total closing inventory with the total opening inventory.
- (b) At the opening of every Shift, in addition to the imprest funds normally maintained by the general Cashiers, the Nation Gaming Operation shall have on hand in the cage or readily available thereto, a reserve Cash bankroll in a minimum amount approved in writing by the SGA.
- (c) The cashier's cage and any satellite cage shall be physically segregated by personnel and function as follows:
 - (1) General cashiers shall operate with individual imprest inventories of Cash and such cashiers' functions shall include, but are not limited to, the following:
 - a. receive Cash, Cash Equivalents, Patron Checks, gaming Chips, complimentary Cash gifts and Nation Gaming Operation Checks from patrons for check consolidations, total or partial redemptions or substitutions;
 - b. receive gaming Chips; slot tokens and prize tokens from patrons or authorized employees in exchange for

- slot tokens, coins or Cash;
- c. receive Cash, Cash Equivalents and Nation Gaming Operation Checks from patrons in exchange for currency or coin;
 - d. receive personal checks for non-gaming purposes from patrons in exchange for Cash;
 - e. receive Cash, Cash Equivalents, Nation Gaming Operation Checks and gaming Chips, slot tokens and prize tokens from patrons in exchange for Customer Deposit Forms;
 - f. receive gaming plaques from patrons in exchange for Cash or Customer Deposit Forms;
 - g. receive Customer Deposit Forms from patrons in exchange for Cash or slot tokens;
 - h. receive promotional coupons from patrons in exchange for currency, slot tokens, or coin;
 - i. receive checks from check cashiers to be returned to patrons for check redemptions, partial redemptions, consolidations or substitutions;
 - j. receive Wire Transfer Acknowledgment Forms for the purpose of completing Customer Deposit Forms;
 - k. receive from check, Chip bank, master coin bank, and reserve Cash cashiers documentation with signatures

thereon, required to be prepared for the effective segregation of functions in the cashier's cage;

- l. receive Voucher forms for the processing of travel expense reimbursements;
 - m. prepare forms for the completion of payments for table game progressive Payout Wagers; and
 - n. prepare patron credit files and verify information therein supporting patron credit applications.
 - o. exchange Slot Counter Checks.
 - p. prepare Jackpot Payout Slips.
 - q. prepare Hopper Fill Slips.
 - r. Receive slot tokens from and transmit slot tokens and prize tokens to, the master coin bank in exchanges supported by proper documentation.
- (2) Check cashiers (also known as "check bank cashiers") shall not have access to Cash and gaming Chips, except in accordance with paragraph (4) below, and such cashiers' functions may include the following:
- a. receive the original and redemption copies of Counter Checks and Slot Counter Checks;
 - b. receive from general cashiers checks accepted for total or partial Counter Check and Slot Counter Check

redemptions;

- c. receive checks from general cashiers for Counter Check and Slot Counter Check consolidations;
 - d. receive personal checks from general cashiers for Counter Check, Slot Counter Check substitutions;
 - e. prepare bank deposit slips or supporting documentation for checks to be deposited;
 - f. receive Wire Transfer Acknowledgment Forms for the purpose of redeeming Counter Checks and Slot Counter Checks or accepting payment on returned Counter Checks and Slot Counter Checks; and
 - g. receive from general, Chip bank and reserve Cash cashiers documentation with signatures thereon, required for the effective segregation of functions in the cashier's cage.
- (3) Chip bank cashiers shall not have access to currency or Cash Equivalents, but shall operate with a limited inventory of fifty cent (\$0.50) and twenty-five cent (\$0.25) cent which may only be used to facilitate odd payoffs or vigorish bets, except in accordance with paragraph (4) below. Such cashiers' functions may include the following:
- a. receive gaming Chips and coin removed from Gaming Tables from a Security Department Member in exchange for the issuance of a Credit;

- b. receive Requests for Fills in exchange for the issuance of a Fill, the dispersal of gaming Chips to a Security Department Member;
- c. receive gaming Chips from the general cashiers, Main Bank cashiers, Cage Supervisors and personnel assigned to a non-cage employee redemption site in exchange for proper documentation;
- d. receive from general, check bank and reserve Cash cashiers documentation with signatures thereon, required for the effective segregation of functions in the cashier's cage;
- e. receive proper documentation from Chippersons in exchange for imprest inventories of gaming Chips, to be used in conformity with the Compact and its Appendices; and
- f. such other functions as approved in writing by the SGA.

(4) Reserve Cash (Main Bank) cashiers' functions shall include, but are not limited to, the following:

- a. receive Cash, Cash Equivalents, issue copies of slot Counter Checks, original copies of Jackpot Payout slips personal checks received for non-gaming purposes and gaming Chips from general cashiers in exchange for Cash;
- b. receive Cash and coin from the coin and currency Count

Room;

- c. receive checks and supporting documentation from check cashiers for deposit if such deposit is not made by the check cashier;
- d. prepare the overall cage reconciliation and accounting records;
- e. prepare the daily bank deposit for Cash and checks;
- f. issue, receive and reconcile imprest funds used by slot attendants and Chippersons;
- g. exchange currency for coupons and currency from slot attendants.
- h. receive from general, Chip and check bank cashiers, documentation with signatures thereon, required to be prepared for the effective segregation of functions in the cashier's cage;
- i. be responsible for the reserve Cash bankroll;
- j. exchange currency, coin, gaming Chips and promotional coupons with the keno booth in exchange for proper documentation;
- k. receive unsecured currency and unsecured promotional coupons from Accounting Department representatives;
- l. receive gaming Chips, slot tokens and coupons from

personnel assigned to a non-cage employee redemption site in exchange for proper documentation;

- m. exchange currency, coin, slot tokens, gaming Chips and coupons with the keno booth in exchange for proper documentation;
- n. perform the functions enumerated below of master coin bank cashiers, but only to the extent that the Nation Gaming Operation has obtained, approval to operate its cashier's cage without the master coin bank;
- o. receive unsecured currency and unsecured coupons from slot department representatives;
- p. prepare Unsecured Bill Changer Currency/Coupon Reports;
- q. receive slot tokens, prize tokens and gaming Chips from personnel assigned to a non-cage employee redemption site in exchange for proper documentation;
- r. receive slugs from the hard Count Room and slot department and maintain the slugs in inventory until destroyed; and,
- s. perform exchanges with the master coin bank supported by proper documentation in accordance with approved internal controls.

- (4) Master coin bank cashiers' functions shall include, but are not limited to, the following:

- a. receive currency, coin, slot tokens, prize tokens, gaming Chips, and coupons from slot cashiers in exchange for proper documentation;
- b. receive coin and slot tokens from the hard Count Room;
- c. Provide slot cashiers with currency, coin, prize tokens and slot tokens in exchange for proper documentation;
- d. Issue, receive and reconcile imprest funds used by slot attendants;
- e. Prepare the daily bank deposit of excess Cash and coins;
- f. Prepare Jackpot Payout Slips;
- g. Prepare Hopper Fill Slips;
- h. Receive slot tokens and prize tokens from Cage Supervisors, general cashiers, Main Bank cashiers and personnel assigned to a non-cage employee redemption site, and transmit slot tokens to general cashiers in exchanges supported by proper documentation;
- i. Exchange currency, coin, slot tokens, gaming Chips and coupons with the keno booth;
- j. Receive slugs from the hard Count Room and slot department and maintain the slugs in inventory until destroyed; and,

- k. Perform exchanges with the Main Bank supported by proper documentation in accordance with approved internal controls.
- (d) Notwithstanding any inconsistent requirements of this Appendix, the Nation Gaming Operation may consolidate the functions of the Chip bank cashier with the functions of the check cashier upon written SGA approval of the Nation Gaming Operation's System of Internal Controls for the consolidated cashier functions.
- (e) Signatures and gaming license numbers of those attesting to the accuracy of the information contained on the cashiers' Count Sheet shall be, at a minimum, of the following cashiers after preparation of the cashiers' Count Sheet:
 - (1) The general cashiers assigned to the incoming and outgoing Shifts;
 - (2) The check cashiers assigned to the incoming and outgoing Shifts;
 - (3) The Chip bank cashiers assigned to the incoming and outgoing Shifts; and
 - (4) The reserve Cash cashiers assigned to the incoming and outgoing Shifts;
- (f) At the end of each gaming day, at a minimum, a copy of the cashiers' Count Sheets and related documentation shall be forwarded to the Accounting Department for agreement of opening and closing inventories, agreement of amounts thereon to other forms, records, and documents required by the Compact and its

Appendices, agreement of transportation reimbursement disbursements with supporting documentation and recording of transactions.

- (g) Coin vaults authorized shall be under the control of the Nation Gaming Operation Accounting Department or an independent Gaming Device cage department established. The storage of coin, prize tokens or slot tokens in, or the removal of coin, prize tokens or slot tokens from, any coin vaults shall be properly documented, and the amount of coin, prize tokens and slot tokens in each coin vault shall be reconciled at the end of each gaming day.
- (h) At least 10 percent of all bags of coins or slot tokens counted and bagged by each slot cashier, master coin bank cashier or Main Bank cashier outside of the Count Room shall be randomly selected and recounted by a slot cashier Supervisor or Cage Supervisor, as applicable, through the use of a weighing device or a counting device. Unless otherwise approved in writing by the SGA, the recount shall be performed prior to the end of the cashier's Shift and shall be recorded on supporting documentation in a manner approved in writing by the SGA. In the alternative, the Nation Gaming Operation may develop internal control procedures as approved in writing by the SGA which ensure that at least 10 percent of all bags of coins or slot tokens counted and bagged by each slot cashier, master coin bank cashier or Main Bank cashier outside of the Count Room shall be randomly selected and recounted. If a discrepancy greater than plus or minus \$1.00 for any denomination of bagged coins or greater than plus or minus one token for bagged slot token denominations of \$25.00 and below is found during the weighing of the sample bag, then the sample bag shall be opened

and recounted by a counting machine provided, however, for slot token denominations greater than \$25.00, any discrepancy shall require a recount. Notwithstanding the foregoing, a representative of the SGA may direct a slot cashier, master coin bank cashier or Main Bank cashier to weigh or recount any bag of coins or slot tokens prepared outside of the Count Room on a random basis.

(i) The assets for which a Chipperson are responsible shall be maintained on an Imprest Basis in accordance with System of Internal Controls approved in writing by the SGA and which, at a minimum, shall provide documentation to the Chip bank, Main Bank and Chipperson for the receipt of the imprest inventory and any subsequent receipt of gaming Chips and currency, and documentation to the Main Bank for the return of the Chipperson's inventory at the end of his or her Shift. The Main Bank shall be responsible for the return to the Chip bank of any gaming Chips remaining in the Chipperson's possession at the end of his or her Shift.

27. Accounting controls for the operation of keno booths, keno lockers, keno work stations and roving keno work stations

- (a) Whenever a keno work station is opened for gaming, the keno work station shall commence operation with an amount of currency and coin known as the "keno inventory." The amount of the keno inventory shall be determined by the Nation Gaming Operation, except that the keno inventory shall not exceed one thousand five hundred dollars (\$1,500.00) for a keno writer working from a roving keno work station, a keno runner working from a keno locker, and a keno writer or keno runner working from a satellite keno booth located in a public keno area. No Nation Gaming Operation shall cause or permit currency, coin or gaming Chips to be added to, or removed from, the keno inventory during the gaming day except:
- (1) In exchange for a keno ticket purchased by a patron;
 - (2) In order to make change for a patron buying a keno ticket;
 - (3) In receipt of a promotional coupon from a patron in exchange for currency, coin or a keno ticket;
 - (4) In payment of a winning or voided keno ticket; or
 - (5) In conformity with the Keno Fill and Keno Credit.
- (b) Whenever a keno work station is opened for gaming activity, the keno inventory shall be stored in a lockable container known as a "keno drawer." For a given Shift, each keno writer and each keno runner authorized to accept and redeem keno Wagers shall have his or her own keno drawer and no other person shall

operate out of the drawer of that keno writer or keno runner. Nothing herein shall preclude a keno writer or keno runner from working at multiple keno work stations throughout the gaming day, provided the keno writer or keno runner appropriately logs on and off each computer terminal and continues to operate from his or her assigned keno drawer.

- (c) Keno drawer inventories shall be prepared by a Main Bank cashier, a Cage Supervisor or a keno Supervisor.
- (d) The keys to the keno drawers containing the keno inventories shall be maintained and controlled in a secure place approved in writing, by the SGA. Each key shall be signed-in and signed-out in accordance with internal control procedures approved in writing by the SGA.
- (e) Immediately prior to opening a keno work station for gaming, each keno writer or keno runner assigned to a work station shall, if the drawer is not already located at that keno work station, transport the keno drawer in the presence of a Security Department Member to the appropriate keno work station where the drawer shall be counted in accordance with the requirements of subdivision (h) below. If the keno writer or keno runner is assigned to a keno work station in a keno booth or satellite keno booth where his or her drawer is already located, the keno writer or keno runner shall count his or her drawer at the keno work station in accordance with the requirements of subdivision (h) below. Each keno runner assigned to work from a keno locker shall, prior to transporting his or her drawer to the keno locker for gaming, count his or her drawer inventory in accordance with the requirements of subdivision (h) below at the keno booth, cashier's cage or other restricted Nation Gaming

Operation area approved in writing by the SGA. After completion of such Count, the keno writer or runner shall, in the presence of a Security Department Member, transport the locked drawer to the keno locker.

- (f) Nothing in this section shall preclude the Nation Gaming Operation from developing approved internal control procedures pursuant to which the keno drawers for a Shift are delivered to the keno booth by a member of the security department, which shall not have access to the keys to unlock the keno drawers.
- (g) Each keno drawer inventory prepared for gaming shall contain an inventory form in addition to the currency and coin. The inventory form shall be, at a minimum, a two-part form; the preparer of the drawer inventory maintains the duplicate as a balancing item, and the original is sent with the currency and coin. The preparer shall record, at a minimum, the following information on the original and duplicate form:
 - (1) The date, time and Shift of preparation of the keno drawer;
 - (2) The keno work station Location Number;
 - (3) The total amount of each denomination of currency and coin to be distributed;
 - (4) The total amount of all denominations of currency and coin to be distributed; and
 - (5) The signature and gaming license number of the preparer.
- (h) The keno writer or keno runner shall count the contents of the

drawer inventory in the presence of a keno Supervisor, and shall assure the accurate comparison of the Count to the figures recorded on the inventory form referenced in subdivision (g) above:

- (1) If the Count and figures agree, the keno writer or keno runner and keno Supervisor shall sign and list their gaming license numbers on the form attesting to the accuracy of the information recorded thereon.
 - (2) If a discrepancy exists between the amount of currency and coins counted and the amount of currency and coins recorded on the inventory form, the appropriate corrections shall be made on the inventory form by the keno Supervisor. The keno Supervisor thereof shall place his or her initials next to each correction. Once all appropriate corrections have been made, the keno writer and keno Supervisor thereof shall sign and list their gaming license numbers on the form. The keno Supervisor shall immediately prepare a discrepancy report and forward a copy of the report to the Accounting Department, the SGA and the security department, and the SGO.
- (i) Upon compliance with the signature requirements of subdivisions (g) and (h) above, the keno writer or keno runner shall input the opening inventory figure in total, or by denomination, into the computer terminal and maintain the form required by subdivision (g) above in the keno drawer until the end of the keno writer's or keno runner's Shift. Notwithstanding the foregoing, the keno Supervisor may input the opening inventory figure or figures into the computer terminal provided the keno writer or keno runner verifies the opening inventory figure or

figures input into the computer to the figures recorded on the inventory form required by subdivision (g) above.

- (j) At the end of each keno writer's or keno runner's Shift, all currency, coin, promotional coupons and gaming Chips remaining in the keno drawer shall be counted by the keno writer or keno runner at the keno booth, satellite keno booth, cashier's cage or other restricted Nation Gaming Operation area approved in writing by the SGA. The keno writer or keno runner shall record on the inventory form required by subdivision (g) above or, on an approved separate one-part form, the following information:
 - (1) The total value of each denomination of currency, coin and gaming Chips in the keno drawer;
 - (2) The total value of all denominations of currency, coins and gaming Chips in the keno drawer;
 - (3) The total value of all coupons in the keno drawer;
 - (4) The total value of the denominations of currency, coins, gaming Chips and promotional coupons in the keno drawer;
 - (5) The total amount of all Keno Fill Slips;
 - (6) The total amount of all Keno Credit Slips; and
 - (7) The signature and gaming license numbers of the preparer.
- (k) Once the form required by subdivision (g) above has been completed with the information required by subdivision (j) above, it shall be placed in the keno drawer. If the Nation

Gaming Operation uses a separate form to record the closing keno inventory pursuant to subdivision (j) above, both forms shall be placed in the keno drawer. The keno drawer shall then be locked by the keno writer or keno runner and either:

- (1) Immediately transported to the cashier's cage or satellite cage by the keno writer or keno runner in the presence of a Security Department Member;
 - (2) Placed in an approved secure storage area in the keno booth and held for subsequent transportation by the security department in a manner approved in writing by the SGA provided, however, that the security department shall not have access to the key to unlock the keno drawer; or
 - (3) Turned over to the keno Supervisor for subsequent reissuance.
- (1) The Nation Gaming Operation shall develop internal control procedures for the accounting and reconciliation of the assets and documents contained within the keno drawers used each gaming day. These procedures, which must be approved in writing by the SGA shall include reports generated by the keno computer system and shall provide for the verification of each keno drawer by a keno Supervisor, Main Bank cashier or Cage Supervisor and the reporting of any overage or shortage. Copies of all reports shall be forwarded to the Accounting Department On a Daily Basis.
- (m) Nothing herein shall preclude a keno writer or keno runner from counting the contents of his or her drawer at an area designed for this purpose within the keno booth, rather than at the keno

work station, provided however, that such area is approved in writing by the SGA.

- (n) Each keno writer and keno runner shall be required to independently count the contents of his or her own drawer and prepare the form required in subdivision (j) above without access to any information recorded on the reports referenced in subdivision (1) above.

28. Acceptance, accounting for and redemption of Patron Cash Deposits

- (a) Whenever a patron requests the Nation Gaming Operation to hold his or her Cash, Cash Equivalent, Gaming Facility check, slot tokens, prize tokens, Jackpot checks, complimentary Cash gift or gaming Chips for subsequent use, the patron shall deliver the Cash, Cash Equivalent, Gaming Facility check, slot tokens, prize tokens, Jackpot checks, complimentary Cash gift or gaming Chips to a general cashier who, after converting any of those non-Cash items into Cash, shall deposit the Cash for credit to the Patron cash Deposit account established for that patron pursuant to this section.

- (b) A file for each patron shall be prepared manually or by computer prior to the acceptance of a Cash deposit from a patron by a general cage cashier and such file shall include, at a minimum, the following:
 - (1) The name of the patron;

 - (2) The date and amount of each Cash deposit initially accepted from the patron;

 - (3) The date and amount of each check initially accepted from the patron, as a draw against a Cash deposit; and

 - (4) The date and amount of each Cash deposit redemption.

- (c) All information recorded on the Patron Cash Deposit file shall be in accordance with the Nation Gaming Operation's approved System of Internal Controls.

- (d) A general cashier accepting a Cash deposit shall prepare a Patron Cash Deposit Form and other necessary documentation evidencing such receipt.
- (e) Patron Cash Deposit Forms shall be serially prenumbered, each series of Customer Deposit Forms shall be used in sequential order, and the series numbers of all Patron Cash Deposit Forms shall be accounted for by employees with no incompatible functions. All original, and duplicate void Patron Cash Deposit Forms shall be marked "VOID" and shall require the signature of the preparer.
- (f) If the Patron Cash Deposit Forms are manually prepared, a prenumbered two-part form, at a minimum, shall be used.
- (g) If the Patron Cash Deposit Forms are computer-prepared, each series of Patron Cash Deposit Forms shall be a two-part form, at a minimum, and shall be inserted in a printer that will simultaneously print an original and duplicate and store, in machine readable form, all information printed on the original and duplicate. The stored data shall not be susceptible to change or removal by any personnel after preparation of a Patron Cash Deposit Form.
- (h) On the original and duplicate of the Patron Cash Deposit Form, or in stored data, the general cashier shall record, at a minimum, the following information:
 - (1) The name of the patron making the Cash deposit;
 - (2) The total amount being deposited (numerical total and

written amount);

- (3) The date of Cash deposit;
 - (4) The signature and gaming license number of the general cashier or, if computer prepared, the identification code and gaming license number of the general cashier; and
 - (5) Nature of the amount received (Cash, Cash Equivalent, Gaming Facility check, Jackpot checks, complimentary Cash gift, Chips slot tokens, prize tokens or Wire Transfer).
- (i) After preparation of the Patron Cash Deposit Form, the general cashier shall obtain the patron's signature on the duplicate copy and shall distribute the copies in the following manner:
- (1) The original shall be given to the patron as evidence of the amount placed on deposit with the Nation Gaming Operation; and
 - (2) The duplicate copy shall be forwarded, along with any other necessary documentation, to the check cashier who shall maintain the documents.
- (ii) A patron shall be allowed to access the Cash deposit by supplying information required by the Nation Gaming Operation, and approved in writing by the SGA to verify his or her identification.
- (1) The Pit Clerk, slot cashier, or general cashier shall ascertain, from the cashier's cage, the amount of the Patron Cash Deposit available and request the amount the

patron wishes to use against this balance. The Pit Clerk shall prepare a Counter Check, or a general cashier or slot cashier shall prepare a Counter Check or Slot Counter Check, with the exception that the words "Patron Cash Deposic Withdrawal" shall be recorded on the Counter Check or Slot Counter Check, in place of the name of the patron's bank; and

- (2) Distribution of the Slot Counter Checks or Counter Checks shall comply with standards for such contained in this Appendix.
- (k) The patron's Cash deposit balance shall be immediately reduced by amounts equal to the Counter Checks or Slot Counter Checks issued in the Pit or at the cage.
- (1) A patron may obtain a refund of any unused portion of his or her funds on deposit by:
 - (1) Sending the Nation Gaming Operation a signed written request for a refund, together with a signed original Patron Cash Deposit Form; or
 - (2) Appearing personally at the cashier's cage or a satellite cage, requesting the refund from a general cashier and returning an original Patron Cash Deposit Form. If a duplicate Patron Cash Deposit Form signed by the patron and maintained pursuant to paragraph (i) (2) above is not located at the cashier's cage or satellite cage where the patron has requested the refund, the Nation Gaming Operation may, in its discretion, perform the refund transaction by:

- a. Having a duplicate Patron Cash Deposit Form of the patron transported by a Security Department Member to a check cashier in the cashier's cage or satellite cage at which the patron is located; or
 - b. Directing the patron to the cashier's cage or one satellite cage where at least of his or her duplicate Patron Cash Deposit Form is being maintained.
- (m) Once the original Patron Cash Deposit Form is presented at a cashier's cage or satellite cage where at least one of that patron's duplicate forms is located, a general cashier at that location shall:
- (1) Verify the unused balance in the Patron's Cash Deposit Form with the check cashier;
 - (2) If the patron has presented the request in person, require the patron to sign the original of the Patron Cash Deposit Form; and
 - (3) Prepare necessary documentation evidencing such refund, which documentation shall include a Counter Check or other document which contains the following information:
 - a. Date, time and Shift of preparation;
 - b. Amount refunded;
 - c. Type of refund made (Cash, Gaming Facility check or Wire Transfer) and whether the refund was requested in

person or in writing;

- d. Patron's name; and
 - e. Signature and gaming license number of the general cashier preparing such documentation.
- (n) The general cashier shall forward each original Patron Cash Deposit Form tendered by the patron pursuant to subdivision (1) above, along with any other necessary documentation, to the check cashier, who shall compare the patron's signature on the original Patron Cash Deposit Form and any attached written signed request required by paragraph (1) (1) above to the patron's signature on the duplicate Patron Cash Deposit Form and on the original Counter Check or slot check. The check cashier shall sign the original Patron Cash Deposit Form if the signatures are in agreement, notify the general cashier of the results of the comparison and maintain the original Customer Deposit Form and the documentation supporting the signature verification.
- (o) If the patron has requested the return of his or her original Patron Cash Deposit Withdrawals, the check cashier shall, unless an alternate procedure permitted by subparagraphs (o) (2) (a) through (o) (2) (c) below is employed, return each of the patron's original Counter Checks or Slot Checks to the general cashier. After the check cashier has notified the general cashier that the signatures contained in subdivision (n) above are a match, the general cashier shall then refund the unused balance of the Cash deposit to the patron, and, if applicable, return the original Counter Check to the patron. The general cashier shall

maintain any necessary documentation to support the signature verification and to evidence such refund.

- (1) If the patron has requested the refund in writing, the general cashier shall give the Cage Supervisor the original checks, to be mailed to the patron and shall refund the unused balance of the Cash deposit, as directed by the patron, either by mailing a Gaming Facility check to the patron, or by a Wire Transfer of the funds to the patron.

- (2) If the patron has personally requested the return of his or her original Patron Cash Deposit Withdrawals, and one or more of the documents are not located at the cashier's cage or satellite cage where the patron has requested the refund, the general cashier making the refund shall either have the documents transported by a Security Department Member to the cashier's cage or satellite cage where the patron made the request, or shall notify the patron that he or she may:
 - a. Have those Patron Cash Deposit Withdrawals returned by mail;
 - b. Go to the cashier's cage or satellite cage where the documents are being maintained, and obtain the documents upon presenting identification credentials as specified in the Nation Gaming Operation's approved System of Internal Controls; or
 - c. Complete the transaction with the Nation Gaming Operation, returning only those Patron Cash Deposit Withdrawals, if any, that are at the cashier's cage or

the satellite cage where the patron made the request.

- (p) A log of all customer deposits received and returned, shall be prepared manually or by computer, On a Daily Basis, by check cashiers, and such log shall include, at a minimum, the following:
 - (1) The balance of the Patron Cash Deposits on hand in the cashier's cage at the beginning of each Shift;
 - (2) For Patron Cash Deposits received and refunded;
 - a. The date of the Patron Cash Deposit or refund;
 - b. Patron Cash Deposit Number;
 - c. The name of the patron; and
 - d. The amount of the Patron Cash Deposit or refund.
 - (3) The balance of the Patron Cash Deposits on hand in the cashier's cage at the end of each Shift.
- (q) The balance of the Customer Deposits on hand in the cashier's cage at the end of each Shift shall be recorded as an outstanding liability, and accounted for by the check cashier.

29. Depositing checks received from gaming patrons

- (a) Unless redeemed or consolidated prior to the time requirements herein, all checks received from gaming patrons shall be deposited in the Nation Gaming Operation's bank account or presented directly to the patron's bank in accordance with subdivision (g) below, in accordance with the Nation Gaming Operation's approved System of Internal Controls procedures, which practice must be previously approved, in writing, by the SGA. Such deposit or presentment shall occur no later than:
- (1) The banking day after the date of the check for a non-gaming check;
 - (2) Seven (7) calendar days after the date of the check for a check in an amount of one thousand dollars (\$1,000.00) or less;
 - (3) Fourteen (14) calendar days after the date of the check for a check in an amount greater than one thousand dollars (\$1,000.00) but less than or equal to five thousand dollars (\$5,000.00); or
 - (4) Forty-five (45) calendar days after the date of the check for a check in an amount greater than five thousand dollars (\$5,000.00).
- (b) All checks received for consolidation shall be deposited in the Nation Gaming Operation's bank account or presented directly to the patron's bank in accordance with subdivision (g) below, within:

- (1) Seven (7) calendar days after the date of the initial check for a consolidating check where the consolidating check is in an amount of one thousand dollars (\$1,000.00) or less;
 - (2) Fourteen (14) calendar days after the date of the initial check for a consolidating check where the consolidating check is in an amount greater than one thousand dollars (\$1,000.00) but less than or equal to five thousand dollars(\$5,000.00); or
 - (3) Forty-five (45) calendar days after the date of the initial check for a consolidating check where the consolidating check is in an amount greater than five thousand dollars (\$5,000.00).
- (c) All checks received as part of a redemption shall be deposited in the Nation Gaming Operation's bank account or presented directly to the patron's bank in accordance with subdivision (g) below, within:
- (1) Seven (7) calendar days after the date of the initial check if the initial check is in an amount of one thousand dollars (\$1,000.00) or less;
 - (2) Fourteen (14) calendar days after the date of the initial check if the initial check is in an amount greater than one thousand dollars (\$1,000.00) but less than or equal to five thousand dollars (\$5000.00); forty-five (45) calendar days after the date of the initial check if the initial check accepted is in an amount greater than five thousand dollars (\$5,000.00).

- (d) In computing a time period prescribed by this section, the last day of the period shall be included unless it is a Saturday, Sunday, or a State or Federal holiday, in which event the time period shall run until the next business day.
- (e) In the event of a series of consolidation or redemption transactions with a single patron, the initial check shall be the earliest dated check returned to the patron in the first of the series of consolidation or redemption transactions.
- (f) Any check deposited into a bank will not be considered clear until a reasonable time has been allowed for such check to clear the bank. The Nation Gaming Operation shall submit to the SGA the time frame allotted for checks to clear the bank.
- (g) In accordance with its approved System of Internal Controls, the Nation Gaming Operation may present a Patron Check directly to the patron's bank for payment.
 - (1) All such internal controls shall include procedures for:
 - a. Documenting the release of the Patron Check from the cashier's cage to an gaming license level three employee of the Nation Gaming Operation or to a licensed attorney, for the purpose of presentment to the patron's bank;
 - b. Prompt deposit of the proceeds of the check to the Nation Gaming Operation' s bank account via a Wire Transfer or a check drawn by the patron's bank and made payable only to the Nation Gaming Operation, if the patron's check is honored and paid; and

- c. Notice to the Nation Gaming Operation that the check has been paid in full by the patron's bank.
- (2) A Patron Check presented in this manner shall be considered paid in full when honored and paid by the patron's bank.
- (h) If the Nation Gaming Operation determines, prior to the deposit or presentment of a Counter Check or Slot Counter Check, that the bank name, the bank routing number, the patron's bank account number or the micro-encoding number contained on the check is incorrect due to a data entry error, a check bank cashier may, in accordance with the approved System of Internal Controls, correct the erroneous entry. Any such internal control procedures shall, at a minimum, include:
 - (1) A description of the manner in which the error will be corrected by the check bank cashier;
 - (2) The creation of a paper trail and control procedures that will permit both the check bank cashier and the Accounting Department to identify and compare a copy of the uncorrected check that was originally issued with the corresponding corrected check that was deposited or redeemed;
 - (3) The written approval of a Cage Supervisor prior to the alteration of any check by a check bank cashier; and
 - (4) A prohibition against using this subsection to change the verified bank account on which the Counter Check or Slot Counter Check was originally drawn.

30. Exchange of checks submitted by gaming patrons; repurchase of Cash Equivalents

- (a) Except as otherwise provided in this section, neither the Nation Gaming Operation nor any person acting on behalf of or under any arrangement with the Nation Gaming Operation shall:
- (1) Cash any check, make any loan, or otherwise provide or allow to any person any credit or advance of anything of value or which represents value to enable any person to take part in gaming activity as a player; or
 - (2) Release or discharge any debt which is uncollectible, either in whole or in part, which represents any losses incurred by any player in gaming activity without maintaining a written record of the deposit, check return and collection efforts; or
 - (3) Make any loan which represents any losses incurred by any player in gaming activity without receiving from said player in exchange therefore, a check in the amount of said loan, which check shall conform with the standards contained within Compact and its Appendices and/ or the System of Internal Controls procedures.
- (b) Neither the Nation Gaming Operation nor any person acting on behalf of or under any arrangement with the Nation Gaming Operation, may accept a check, other than a recognized travelers' check or other Cash Equivalent, a Gaming Facility check or an Jackpot checks from any person to enable such person to take part in Class III Gaming activity as a player, or may give Cash or Cash Equivalents in exchange for such check unless

the requirements of this section or any other section within this Appendix concerning check Cashing, redeeming, consolidating, collecting and recording procedures are observed by the Nation Gaming Operation and its employees and agents. For purposes of this section: the term "check" when used in connection with an exchange, redemption, substitution or consolidation by a patron shall mean any draft drawn by the patron which is a "Cash item" as defined in Regulation J of the Board of Governors of the Federal Reserve System, 12 Code of Federal Regulation 210.2(e), and which is drawn on an account maintained in a "depository institution" as defined in Section 19 (b) of the Federal Reserve Act, 12 United States Code § 461(b), including share drafts and drafts drawn on negotiable order of withdrawal accounts or similar accounts. The term "checking account" shall mean any account on which a "check" is drawn; and the term "bank" shall include any "depository institution" as defined in 12 United States Code § 461(b). For purposes of this section, a check received from a person by Cage Cashiers may be presumed by the Nation Gaming Operation not to be exchanged to enable such person to take part in gaming activity as a player, if the Nation Gaming Operation shall cause to be posted at each general cashier station in the cashier's cage a conspicuous sign that reads:

"Personal checks in excess of \$1,000.00 shall not be exchanged for currency or coin to be used for gaming purposes."

- (c) All checks sought to be exchanged in the Gaming Facility by a patron shall be:
 - (1) Drawn on a bank and payable on demand;

- (2) Drawn for a specific amount;
 - (3) Made payable to the Nation Gaming Operation; and
 - (4) Currently dated, but not post-dated.
- (d) All checks sought to be exchanged at the cashier's cage shall be presented directly to the general cashier who shall:
- (1) Restrictively endorse the check "for deposit only" to the Nation Gaming Operation's bank account;
 - (2) Initial the check;
 - (3) Date and time stamp the check;
 - (4) Immediately exchange the check for currency and coin in an amount equal to the amount for which the check is drawn, not to exceed one thousand dollars (\$1,000.00) per patron per day; and
 - (5) Forward redemption, consolidation and substitution checks to the check cashier and all personal checks to the Main Bank cashier.
- (e) Cash Equivalents, Gaming Facility checks and Jackpot checks shall only be accepted at the cashier's cage by general cashiers.
- (1) Prior to the acceptance of any Cash Equivalent from a patron, the general cashier shall determine the validity of such Cash Equivalent by performing the necessary

verification for each type of Cash Equivalent and such other procedures as may be required by the issuer of such Cash Equivalent or other requirement as specified in writing by the SGA. Prior to the acceptance of any Gaming Facility check or an Jackpot checks from a patron, the general cashier shall comply with the requirements of subdivision (f) below.

- (2) In order to ensure the patron's identity, prior to the acceptance of a Cash Equivalent made payable to a presenting patron, a Gaming Facility check or an Jackpot checks, the general cashier shall be required to verify that the patron's signature recorded on the Cash Equivalent, Gaming Facility check or the Jackpot checks and the patron's physical appearance agree with the information recorded in a patron signature file or with the signature and, if applicable, photograph or physical description contained on an identification credential issued by a governmental agency presented by the patron. The Nation Gaming Operation shall maintain documentation supporting that verification.
- (3) Any Cash Equivalent other than a travelers check or credit card, any Gaming Facility check or Jackpot checks which is accepted from a patron by a general cashier shall be:
 - a. Endorsed in blank by the patron (but in the case of a Cash Equivalent, only if the Cash Equivalent is made payable to the presenting patron); and
 - b. Except as otherwise provided in subparagraph (e) (4) (b) below, restrictively endorsed "For Deposit Only" to

the bank account of the Nation Gaming Operation immediately upon acceptance by the general cashier and deposited no later than the next banking day following the date of the transaction.

- (4) The Nation Gaming Operation may, if approved in writing by the SGA allow a patron who has exchanged a Cash Equivalent (other than a travelers check or credit card) for currency, coin or a Customer Deposit Form to repurchase the Cash Equivalent for an equal amount of Cash or gaming Chips or slot tokens prior to the deposit of the Cash Equivalent by the Nation Gaming Operation. If the Nation Gaming Operation agrees to provide a patron with this repurchase option, the general cashier shall, prior to acceptance of the Cash Equivalent:
 - a. Immediately determine the validity of the Cash Equivalent by performing the verification required in paragraph (e) (1) above; and
 - b. In lieu of complying with the requirements of subparagraph (e) (3) (b) above, comply with the approved System of Internal Controls procedures for the processing of such transactions, which procedures shall include, at a minimum, the following:
 1. The creation of an audit trail which shall assure that no single employee is in a position to convert the Cash Equivalent to his or her personal use without detection;
 2. The establishment of a definite time limit on

the repurchase rights of the patron, which time limit shall be no later than the end of the fifth calendar day following the date of acceptance of the Cash Equivalent; and

3. Upon expiration of the time limit required by clause (e) (4) (b) (2) above, the immediate restrictive endorsement of the Cash Equivalent "For Deposit Only" to the bank account of the Nation Gaming Operation, and the deposit of the Cash Equivalent by no later than the next banking day.

(f) The Nation Gaming Operation shall maintain a Gaming Facility check log and an Jackpot checks log.

- (1) The general cashier of the Nation Gaming Operation accepting a Gaming Facility check shall document the verifications performed in subdivision (f) above in the Gaming Facility check log and shall also record therein his or her name and gaming license number, the name of the cashier providing such information and the date and time the information was obtained; or
- (2) The general cashier of the Nation Gaming Operation accepting an Jackpot checks shall document the verifications performed in section paragraph (f) (1) above in the Jackpot checks log, and shall record therein the manner in which the information was obtained, including, if applicable, the name of any person providing the information and the date and time the information was obtained.

- (g) Prior to acceptance of a travelers check from a patron, the general cashier shall verify its validity by:
 - (1) Requiring the patron to countersign the travelers check in his or her presence;
 - (2) Comparing the countersignature with the original signature on the travelers check;
 - (3) Examining the travelers check for any other signs of tampering, forgery or alteration; and
 - (4) Performing any other procedures which the issuer of the travelers check requires in order to indemnify the acceptor against loss.

- (h) A person may obtain Cash or slot tokens at the cashier's cage or slot booth or Cash at the keno booth to be used for gaming purposes by presenting a recognized credit or debit card to a general cashier, pari-mutuel cashier, keno writer or slot cashier in transactions known as a credit card Cash transaction or a debit card Cash transaction.

- (i) The following procedures and requirements over Counter Checks shall be observed:
 - (1) Counter Checks shall be serially prenumbered forms; each series of Counter Checks shall be used in sequential order, and the series numbers of all Counter Checks received by the Nation Gaming Operation shall be accounted for by employees with no incompatible functions. The original and all copies of void Counter Checks shall be marked "VOID"

and shall require the signature and gaming license number of the Gaming Facility clerk.

- (2) If Counter Checks are manually prepared:
 - a. Each series of Counter Checks shall be a five-part form, at a minimum, consisting of an original, a redemption copy, an accounting copy, an issuance copy and acknowledgment copy, all of which shall be attached in a book that will permit an individual slip in the series and its copies to be written upon simultaneously, while still contained in the book, and that will allow the removal of the original and all duplicate copies.
 - b. Access to the Counter Checks shall be maintained and controlled at all times by the Gaming Facility clerks responsible for controlling and accounting for the unused supply of Counter Checks, and the preparation of Counter Checks for a patron's signature.
- (3) When Counter Checks are computer prepared, each series of Counter Checks shall be a four-part form, at a minimum, consisting of an original, a redemption copy, an issuance copy and accounting copy, all of which shall be inserted in a printer that will: simultaneously print an original and duplicates and store, in machine readable form, all information printed on the original and duplicates, and discharge the original and duplicates. The stored data shall not be susceptible to change or removal by any personnel after preparation of a Counter Check.

(i) For each Counter Check exchanged at a Gaming Table, the Gaming Facility clerk shall:

(1) Verify the patron's identity by either:

- a. Obtaining the patron's signature, on a form, which signature shall be compared to the signature contained within a patron signature file. The Gaming Facility clerk shall sign the form indicating that the signature of the patron on the form appears to agree with the signature in the patron signature file. Such form shall be attached to the Accounting Department's copy of the Counter Check exchanged by the patron prior to forwarding it to the Accounting Department in conformity with section subdivision (n) below. After the patron's identity has been verified by the Gaming Facility clerk as required above, the requirements for subsequent verification of the patron's identity during the same Shift and in the same gaming Pit may be satisfied by that Gaming Facility clerk signing a form attesting to the patron's identity before each subsequent Counter Check is exchanged. The form shall include the patron's name and the serial number of the initial Counter Check exchanged by the patron. Such form shall be attached to the Accounting Department's copy of the Counter Check prior to forwarding it to the Accounting Department in conformity with subdivision (n) below; or
- b. Obtaining the attestation of a Gaming Facility Supervisor as to the identity of the patron. The Gaming Facility Supervisor shall sign a form attesting

to the patron's identity and shall record his gaming license number thereon. Such form shall be attached to the Accounting Department's copy of the Counter Check exchanged by the patron prior to forwarding it to the Accounting Department in conformity with subdivision (p) below.

- (2) Determine the patron's remaining credit limit from the cashier's cage.
- (3) Prepare the Counter Check for a patron's signature by recording, at a minimum, on the face of the original and all duplicates of the Counter Check, with the exception of the acknowledgment copy which shall only have recorded on it the game and table number, or in stored data, the following information:
 - a. The name of the patron exchanging the Counter Check;
 - b. The name of the patron's bank (required on the original copy only);
 - c. The current date and time;
 - d. The amount of the Counter Check expressed in numerals;
 - e. The game and table number;
 - f. The signature and gaming license number of the Gaming Facility Supervisor authorizing acceptance of the check; and

- g. The signature and gaming license number of the preparer or, if computer prepared, the identification code and gaming license number of the preparer.
- (4) Place an impression on the back of the original Counter Check a restrictive endorsement "for deposit only" to the Nation Gaming Operation's bank account.
 - (5) Present the original and all duplicate copies of the Counter Check to the patron for signature.
 - (6) Receive the signed Counter Check directly from the patron. The issuance copy, which is the equivalent of a Check Credit Slip, of the Counter Check shall be immediately and directly given to the Dealer or Boxperson at a Gaming Table. In no instance shall the Chips be given to the patron prior to the receipt of the issuance copy of the Counter Check by the Dealer or Boxperson.
 - a. The original, redemption, and acknowledgment copies of the Counter Check shall be expeditiously transported to the cashier's cage where the original and redemption copies shall be maintained and controlled by the Check Bank cashier;
 - b. The Accounting Department's copy of the Counter Check shall be maintained and controlled at all times by the Gaming Facility clerk; and
 - c. The issuance copy of the Counter Check shall be deposited by the Dealer or Boxperson into the Drop Box immediately after the issuance of Chips to the patron.

- (j) If the Chip Bank Cashier receives the original, redemption and acknowledgment copies of the Counter Check the Chip Bank Cashier shall sign, record his or her gaming license number and time stamp the acknowledgment copy of the Counter Check and expeditiously return it to the Gaming Facility clerk via a Security Department Member, the Gaming Facility clerk shall transfer the original and redemption copies of the Counter Check to the Check Cashier in return for properly signed documentation.
- (k) If the Check Cashier receives the original, redemption and acknowledgment copies of the Counter Check directly from the Gaming Facility clerk the Check Cashier shall sign, record his or her gaming license number and time stamp the acknowledgment copy and shall transmit it to the Gaming Facility clerk via a Security Department Member. The Check Cashier shall maintain the original and redemption copies of the Counter Check.
- (l) The acknowledgment copy of the Counter Check returned to the Gaming Facility clerk shall be agreed to the Accounting Department's copy and maintained and controlled by the Gaming Facility clerk.
- (m) If the total amount of Chips possessed by a patron exceeds five hundred dollars (\$500.00), the Nation Gaming Operation shall request that the patron apply all Chips in his or her possession to the redemption of Counter Checks exchanged for purposes of gaming prior to exchanging such Chips for Cash or prior to departing from the Gaming Facility.
- (n) At the end of each gaming day, at a minimum, the following procedures and requirements shall be observed:

- (1) The original and all copies of void Counter Checks and the accounting and acknowledgment copies of the Counter Check shall be forwarded by a representative of the security department to the Accounting Department for agreement, On a Daily Basis, with the issuance copy of the Counter Check removed from the Drop Box or computerized stored data.

- (2) The redemption copy of a Counter Check maintained and controlled in conformity with subparagraph (i) (6) (a) above, shall be forwarded to the Accounting Department subsequent to the redemption, consolidation or deposit of the original Counter Check for agreement with the Accounting Department's and issuance copies of the Counter Check or stored computerized data.

31. Substitution, redemption and consolidation of Patron Checks at the cashier's cage; initiation of transactions by mail

- (a) The drawer of an undeposited Counter Check may use a personal check to substitute for or partially redeem such Counter Check or to consolidate two or more undeposited Counter Checks in accordance with the approved System of Internal Controls.
 - (1) For purposes of this section, a personal check which is used by a drawer in a substitution, partial redemption or consolidation transaction shall be referred to as a "replacement check."
 - (2) The drawer of an undeposited replacement check may use another replacement check in a substitution, consolidation or partial redemption transaction involving the original replacement check.

- (b) The drawer of an undeposited Patron Check may redeem it:
 - (1) In its entirety by exchanging Cash, Cash Equivalents, complimentary Cash gifts, Gaming Facility checks, Jackpot checks, slot tokens, or gaming Chips in an amount equal to the amount of the Patron Check being redeemed; or
 - (2) In part by exchanging:
 - a. Another Patron Check in a lesser amount; and
 - b. Cash, Cash Equivalents, complimentary Cash gifts, Gaming Facility checks, Jackpot checks, slot tokens, or gaming Chips in an amount which equals the

difference between the amount of the check exchanged in section subparagraph (b) (2) (a) above, and the amount of the Patron Check being partially redeemed.

- (c) If a drawer has more than one undeposited Patron Check outstanding, such checks shall be redeemed in reverse chronological order (the most recently dated Patron Check shall always be redeemed first).
 - (1) If more than one Patron Check bears the same date, the drawer may choose the order in which to redeem the identically dated checks.
 - (2) If, pursuant to its approved System of Internal Controls, the Nation Gaming Operation does not require a Patron Check used in a substitution, consolidation or partial redemption transaction to be dated with the date of the initial Patron Check being substituted, consolidated or partially redeemed, then the date of the initial Patron Check, and not the date of the replacement, consolidation or partial redemption check, shall be used to determine the order in which Outstanding Patron Checks shall be redeemed.
- (d) The drawer of a Patron Check may consolidate some or all undeposited Patron Checks by exchanging another Patron Check in an amount equal to the total amount of the Outstanding Patron Checks being consolidated.
- (e) Except as otherwise provided in this section, all consolidations, total or partial redemptions or substitutions of Patron Checks shall be initiated by the drawer of the Patron Check and processed by a general cashier at a cashier's cage or

a satellite cage. Consolidation, redemption or substitution of personal checks exchanged for nongaming purposes shall not be allowed.

- (f) Notwithstanding subdivision (e) above, the drawer of one or more Outstanding Patron Checks may initiate a redemption, substitution or consolidation transaction mailing an authorized instrument to the Nation Gaming Operation, provided that the Nation Gaming Operation complies with all relevant provisions of this section, and its approved System of Internal Controls, which internal controls shall, at a minimum, include:
- (1) Procedures requiring that any authorized instrument received by the Nation Gaming Operation through the mail be forwarded directly to the Accounting Department, which department shall maintain oversight of the transaction at all times and shall record the receipt of the authorized instrument, including, without limitation:
 - a. The date that the authorized instrument is received;
 - b. The name of the drawer;
 - c. The amount and type of any payment received and, if applicable, the check number of any replacement check received; and
 - d. The signature and gaming license number of the Accounting Department employee who receives the authorized instrument;
 - (2) The notation of the transaction in the patron's credit file

including, without limitation, the specific terms of any oral instructions or a copy of any written instructions from the patron concerning the intended use of the authorized instrument;

- (3) Procedures governing the verification and processing of the authorized instrument including, where appropriate, its transfer to the check bank;
 - (4) A method of documenting and processing the receipt of payments toward the total or partial redemption of a Patron Check, if the authorized instrument received is insufficient to effectuate a requested redemption; and
 - (5) Procedures for the return of the original Patron Check to the drawer in accordance with subdivision (i) below if the transaction results in a substitution, consolidation or redemption.
- (g) No Nation Gaming Operation, employee thereof or any other person acting on behalf of or under any arrangement with the Nation Gaming Operation, shall accept any Patron Check in redemption, consolidation or substitution of any Patron Check for the purpose of avoiding or delaying the deposit of a Patron Check in a bank for collection or payment within the required time periods.
- (h) Upon completion of a redemption, consolidation or substitution transaction pursuant to this section, the general cashier shall return any original Patron Check being redeemed, consolidated or substituted to the drawer in accordance with the requirements in subdivision (i) below. If the redemption, consolidation or

substitution of a Patron Check is accomplished by the acceptance of another Patron Check, the general cashier accepting the new Patron Check shall date and time stamp the new check, place his or her initials on the new check, and record on the new check the serial number of any Counter Check, Slot Counter Check or replacement check being redeemed, consolidated or substituted. The new Patron Check shall be dated with the date of the initial Patron Check being redeemed, consolidated or substituted unless the System of Internal Controls includes an independent procedure to ensure that the date of the initial Patron Check shall be used to determine the date by which the new Patron Check shall be redeemed or deposited.

(i) Any original Patron Check which may be returned to the drawer pursuant to this section shall be returned directly to the drawer by one of the following methods:

(1) If the drawer personally appears at a cashier's cage or a satellite cage of the Nation Gaming Operation and requests the return of the check, the general cashier shall:

a. Obtain the original Patron Check from the check bank cashier;

b. Verify the identity of the drawer by either:

1. Obtaining the patron's signature and comparing it to the signature on the check to be returned;

2. Comparing the signature on the patron's identification to credential to the signature on the check to be returned;

3. Comparing the drawer's actual appearance to the general physical description in a patron signature file, or with a photograph on an identification cards issued by a government agency; or
 4. Obtaining the personal attestation of a cage or Gaming Facility Supervisor as to the identity of the drawer; and
- c. Return the original Patron Check to the drawer contemporaneously with the request unless the Nation Gaming Operation is authorized to return the check to the drawer in accordance with subdivision (j) below, in which event the Nation Gaming Operation shall return the check in accordance with those procedures or, at the drawer's request, mail the check to the drawer pursuant to paragraph (i) (2) below.
- (2) If the drawer requests, either orally or in writing, that one, some or all of his or her Patron Checks be returned by mail, the Nation Gaming Operation shall maintain a record of the specific terms of any oral request or a copy of the written request in the credit file of the drawer and the check bank cashier shall:
- a. Obtain the original Patron Check; and
 - b. Present the original Patron Check to a Cage Supervisor who shall direct a Accounting Department employee, as authorized in the System of Internal Controls, to mail

the Patron Check by ordinary mail to only the address of the drawer's current residence as indicated in his or her credit file; provided, however, that the Patron Check may be returned by ordinary mail to any other address requested by the drawer for which the drawer certifies, in writing, that the address information is accurate and for which the Nation Gaming Operation maintains in the credit file a record of the request and the certification, and a log of the details of each Patron Check so mailed.

(j) Whenever an original Patron Check to be returned pursuant to paragraph (i) (1) above is located at a cashier's cage or satellite cage other than the one at which the drawer has personally appeared and the Nation Gaming Operation chooses not to have the original Patron Check transported to the cashier's cage or satellite cage where the drawer personally appeared (the "drawer's location"), the Nation Gaming Operation shall complete the transaction by returning the original Patron Check as follows:

(1) The general cashier at the drawer's location shall, after confirming that the drawer's original Patron Check is located at the cashier's cage or a satellite cage elsewhere in the Gaming Facility and notifying the drawer of that location, prepare a redemption receipt that includes, at a minimum, the following information, and shall deliver the completed original to the drawer and retain the copies for further processing in accordance with the Nation Gaming Operation's internal controls:

a. The name or trade name of the Nation Gaming Operation

issuing the receipt;

- b. The serial number and dollar amount of each original Patron Check to be returned; provided, however, that nothing in this subparagraph shall prevent the Nation Gaming Operation from issuing a separate redemption receipt for each original Patron Check;
- c. The signature of the drawer on the duplicate and the signature and gaming license number of the general cashier issuing the redemption receipt on the original and on each copy; and
- d. The date on which the redemption receipt is issued; and

(2) When a drawer to whom a redemption receipt has been issued pursuant to paragraph (j) (1) above appears at a cashier's cage or satellite cage and requests the return of an original Patron Check specified in the receipt, a general cashier at that location shall, at a minimum:

- a. Obtain the original redemption receipt from the drawer and the duplicate thereof from the cashier maintaining the document; provided, however, that in the event the drawer does not produce a redemption receipt for each original Patron Check to be returned, the check for which the drawer does not tender a receipt shall only be returned if the general cashier, in accordance with the system of internal controls, verifies the drawer's identity and is able to determine the check that is to be returned;

- b. Confirm that the original Patron Check or checks specified in the receipt are physically present in that cage; provided, however, that if an original Patron Check specified in the redemption receipt is not at that cashier's cage or satellite cage, the general cashier shall direct the drawer to the cashier's cage or satellite cage where the original Patron Check is located or obtain the item in accordance with subparagraph (i) (1) (a) above for return to the drawer; and
 - c. Verify the identity of the drawer in accordance with subparagraph (i) (1) (b) above, obtain the check to be returned and thereafter return the original Patron Check to the drawer.
- (k) The approved System of Internal Controls shall ensure that redemption receipts are issued in accordance with subdivision (j), above and shall include, at a minimum, procedures for monitoring issued and not yet presented redemption receipts and for reconciling the inventory of the check bank cashiers.

32. Procedure for collecting and recording checks returned to the Nation Gaming Operation after deposit

- (a) All dishonored checks (returned checks) returned by a bank after deposit, shall be returned directly to, and controlled by, Accounting Department employees, and shall be maintained by check bank cashiers. Such employees shall have no incompatible functions.
- (b) No person other than a licensed individual working in a separate collection unit within the Accounting Department as an gaming license level two employee, and one who has no incompatible functions, may engage in efforts to collect returned checks, except that an attorney-at-law representing the Nation Gaming Operation may bring action for such collection. Any oral or written communication with patrons regarding collection efforts shall be documented.
- (c) Continuous records of all returned checks shall be maintained by Accounting Department employees with no incompatible functions. Such records shall include, at a minimum, the following:
 - (1) The date the check was drawn;
 - (2) The name and address of the drawer of the check;
 - (3) The amount of the check;
 - (4) The date(s) the check was dishonored;
 - (5) The Counter Check or Slot Counter Check serial number for Counter Checks or Slot Counter Checks; and

- (6) The date(s) and amount(s) of any collections received on the check after being returned by a bank, including the date (s) and amount (s) of any complimentary Cash gifts applied as payment on the check after being returned by a bank.
- (d) A check dishonored by a bank may be immediately redeposited if there is sufficient reason to believe that the check will be honored the second time. If the Nation Gaming Operation determines that a Counter Check or Slot Counter Check was returned by a bank because the bank name, the bank routing number, the patron's bank account number or the micro-encoding number contained on the check was incorrect due to a data entry error, a check bank cashier may, in accordance with the approved System of Internal Controls, correct the erroneous entry and cause the check to be redeposited. Any such internal control procedures shall, at a minimum, include:
- (1) A description of the manner in which the error will be corrected by the check bank cashier;
 - (2) The creation of a paper trail and control procedures that will permit both the check bank cashier and the Accounting Department to identify and compare a copy of the uncorrected check that was originally deposited with the corresponding corrected check that was redeposited;
 - (3) The written approval of a Cage Supervisor, prior to the alteration of any check by a check bank cashier; and
 - (4) A prohibition against using this paragraph to change the

verified bank account on which the Counter Check or Slot Counter Check was originally drawn.

- (e) Statements shall be sent to patrons, by Accounting Department employees with no incompatible functions, immediately upon initial receipt of a returned check, or immediately upon receipt of a check returned for a second time, if the check was immediately redeposited pursuant to subdivision (d) above. Such statements shall include, but not be limited to, the following:
 - (1) The name and address of the drawer;
 - (2) The date the check was drawn;
 - (3) The amount of the check; and
 - (4) The date(s) and amount(s) of any collections received on the check after being returned by the bank.
- (f) Patrons to whom statements are sent shall be advised of a return address and the name of the department to which replies shall be sent.
- (g) Employees with no incompatible functions shall receive directly, and shall initially record, all collections.
- (h) Copies of statements and other documents supporting collection efforts shall be maintained and controlled by Accounting Department employees with no incompatible functions.
- (i) A record of all collection efforts shall be recorded and maintained by the Accounting Department's collection unit.

- (j) After reasonable collection efforts, returned checks may be considered uncollectible for accounting purposes, and charged to the Nation Gaming Operation's allowance for uncollectible patrons' checks. Any patron's indebtedness, in excess of one thousand dollars (\$1,000.00), may only be considered uncollectible for accounting purposes, and charged to the allowance for uncollectible patrons' checks account, after the following information has been included in the patron's credit file:
- (1) Documentation of the Accounting Department's collection unit efforts to collect the patron's outstanding checks, and the reason(s) why such collection efforts were unsuccessful; and/or
 - (2) A letter from an attorney representing the Nation Gaming Operation documenting the efforts to collect the patron's outstanding checks, and the reason(s) why such collection efforts were unsuccessful or were not pursued further.
- (k) Listings of uncollectible checks shall be approved in writing by, at a minimum, the chief executive officer, an gaming license level two employee or higher approved in writing by the SGA and the controller or the person to whom the controller directly reports; provided that, with the exception of the chief executive officer, none of the foregoing persons shall also have the authority to approve credit. All such uncollectible checks and listings shall be maintained and controlled by Accounting Department employees. A continuous trial balance of all uncollectible checks shall be maintained by employees of the Accounting Department. The continuous trial balance shall be

adjusted for any subsequent collections.

- (1) In instances where checks have been deemed uncollectible and have been charged off by the Nation Gaming Operation, Federal income reporting requirements regarding the forgiveness of debt shall be adhered to.

33. Acceptance of payments toward outstanding Patron Checks

- (a) The Nation Gaming Operation may, in its discretion, permit the drawer of an undeposited Patron Check, or any person acting for the benefit of such drawer, to deposit Cash, Cash Equivalents, slot tokens, Gaming Facility checks or gaming Chips with a general cashier for the purpose of having such payment applied to the total or partial redemption of the Patron Check by the drawer.

- (b) Prior to the Nation Gaming Operation accepting payments pursuant to subdivision (a) above, the Nation Gaming Operation shall establish an approved System of Internal Controls for such transactions, which internal controls shall, at a minimum, provide for:
 - (1) A method of documenting or recording the receipt of each such payment, which method shall include, without limitation, the following:
 - a. The names of the drawer and the person making the payment;
 - b. All significant details concerning the transaction;
 - c. The signatures of the person making the payment and the general cashier accepting the payment, including the gaming license number of the general cashier; and
 - d. The issuance of a receipt to the person making the payment;

- (2) The maintenance of the general cashier's imprest inventory; and
 - (3) The notation in the drawer's credit account of the receipt of the payment.
- (c) If any payments received by the Nation Gaming Operation pursuant to this section entitle the drawer of a Patron Check to redeem the original Patron Check in its entirety, or if any such payments received in conjunction with the submission of a new Patron Check by the drawer in a lesser amount entitle the drawer of a Patron Check to redeem the original Patron Check in part, the Nation Gaming Operation shall return the original Patron Check to the drawer.
- (d) If the drawer of a Patron Check fails to redeem it prior to the date on which the Patron Check must be deposited, the Nation Gaming Operation shall deposit the Patron Check regardless of whether any payment has been received pursuant to the provisions of this section, or not. The Nation Gaming Operation, after timely depositing the Patron Check and allowing a commercially reasonable time for the Patron Check to clear in accordance with its System of Internal Controls established, shall apply any payments received pursuant to this section in accordance with the following priorities:
- (1) If the Nation Gaming Operation has any returned checks issued by the drawer which have not been completely satisfied, the payments shall be applied to such obligations;
 - (2) If the Nation Gaming Operation, after all obligations of

the drawer described in paragraph (d) (1) above have been completely satisfied, possesses any Outstanding Patron Checks issued by the drawer which have not been deposited or cleared, the Nation Gaming Operation shall hold the payments until all Outstanding Patron Checks of the drawer have cleared; or

- (3) If the Nation Gaming Operation does not have any unpaid returned checks or Outstanding Patron Checks issued by the drawer, the payments shall be returned immediately to the drawer unless the drawer has orally or in writing instructed the Nation Gaming Operation to retain the payments in a Cash deposit account and the Nation Gaming Operation maintains in the credit file a record of the specific terms of those instructions, including a copy of any written instructions.
- (e) Any payment received pursuant to this section that the drawer directs be deposited in a Patron Cash Deposit account pursuant to paragraph (d) (3) above shall be deposited by the Nation Gaming Operation except that, if the drawer is not present:
- (1) The Patron Cash Deposit Form may be prepared without the patron's signature on the duplicate copy;
 - (2) The original of the Patron Cash Deposit Form shall be mailed to the drawer; and
 - (3) After the payment is deposited in the Patron Cash Deposit account, it shall only be used by, or refunded to, the drawer.

- (f) If a Patron Check is dishonored by the drawer's bank upon presentation for payment and returned to the Nation Gaming Operation, any payments received pursuant to this section, including payments that have been transferred to a Patron Cash Deposit account pursuant to paragraph (d) (3) above, that have not been returned to the drawer shall be used to reduce the amount to be collected from the drawer or to be deemed uncollectible.

- (g) Except as otherwise provided in this section, any payment authorized by this section shall be made for the sole benefit of the drawer. No junket representative, junket enterprise or employee or agent of a junket enterprise shall, and no Nation Gaming Operation or employee or agent of the Nation Gaming Operation shall, except as specifically authorized in writing by the SGA make a payment for the benefit of the drawer of a Patron Check pursuant to this section.

34. Extension of credit, and recording checks exchanges, redeemed or consolidated, redemption, consolidation or substitution of checks submitted by gaming patrons

(a) Purpose of credit extension procedures; establishment of procedures.

(1) The Nation Gaming Operation shall establish internal control procedures for extending credit for the following reasons:

- a. To ensure that Markers issued by the Nation Gaming Operation are issued only in accordance with the specific or general authorization of the Compact and its Appendices.
- b. To ensure that the functions, duties, and responsibilities of Nation Gaming Operation's employees involved in the extension of credit are appropriately segregated and performed in accordance with sound accounting practices by competent, qualified personnel.
- c. To ensure that a Nation Gaming Operation employee is not in a position to perpetuate and conceal errors or irregularities in the normal course of his or her duties.
- d. To ensure that the internal control procedures are conducted with integrity and in accordance with the Compact and its Appendices.

(2) The Nation Gaming Operation shall establish written policies and procedures to extend credit to patrons. The policies and procedures shall require that each credit transaction is promptly and accurately recorded.

(b) Submission of extension of credit procedures.

(1) The Nation Gaming Operation shall establish internal control procedures for extending credit and submit them to the SGA, to be approved in writing by SGA.

(2) Procedures for extending credit shall be in compliance with this section.

(3) Both of the following provisions apply to the internal control procedures affecting the of extension of credit:

a. The Nation Gaming Operation shall submit internal control procedures for extending credit to the SGA not less than thirty (30) days before the commencement of gaming.

b. Procedures for extending credit shall not be utilized by the Nation Gaming Operation unless the internal control procedures for extending credit have been submitted, in writing, and have been approved, in writing, by the SGA.

(4) The SGA may disapprove any portion of the internal control procedures concerning the extension of credit. If the SGA disapprove a procedure concerning the extension of credit, then the SGA shall notify the Nation Gaming Operation, in

writing, of the disapproval, with a copy to the SGA.

- (5) Access to the credit information, outstanding credit instruments, and credit instruments that have been written off as uncollectible is restricted to employees whose duties require access to such information, who have been authorized by Gaming Facility Accounting Department to have access such records, and whose the names and gaming license numbers have been furnished in writing to the SGA.
- (c) Amendments to internal control procedures for extending credit. Both of the following provisions apply to an amendment to internal control procedures for extending credit:
- (1) Unless otherwise authorized by the SGA an amendment to a portion of the internal control procedures for extending credit shall be submitted to the SGA not less than forty-five (45) days before utilizing the procedures for extending credit; and
 - (2) The Nation Gaming Operation shall not utilize an amendment to the internal control procedures for extending credit unless the amendment to such procedures for extending credit has been submitted, in writing, to the SGA and approved in writing by the SGA, with a copy to the SGO.
- (d) Application of credit.
- (1) The SGA approved internal control procedures for establishing credit shall, at a minimum, include the following:

- a. A credit file shall be completed and maintained for each patron to whom credit is extended. This file shall include, at a minimum, all of the following:
 1. A credit application, including, but not limited to, all of the following information:
 - A. Patron's name;
 - B. Requested credit line;
 - C. Patron's current home address;
 - D. Patron's home telephone number;
 - E. Patron's date of birth;
 - F. Patron's place of employment and position held;
 - G. Patron's employer's address and telephone number;
 - H. Patron's bank address;
 - I. Patron's checking account number; and
 - J. patron's social Security number.
 2. Authorized credit limit;
 3. A photocopy of the patron's Photographic

Identification;

4. A history of all credit issued to the patron and payments received or written off as uncollectible by the Nation Gaming Operation; and
 5. Verification of the credit application and approval of credit establishment.
- b. Procedures for verification of the credit application.
 - c. Procedures for the review and approval of the credit limit for the patron.
 - d. Procedures to increase or decrease an established credit line.
 - e. Other procedures deemed necessary by the SGA to ensure compliance with the stated purpose of the Compact and its Appendices.
- (2) The Nation Gaming Operation shall not extend credit to a patron who has exceeded an established credit line.
- (e) Verification of credit.
- (1) The Nation Gaming Operation may verify a patron's outstanding indebtedness, as required by this section, by contacting a consumer credit bureau that is reasonably likely to possess information concerning the patron, to determine whether the patron has any liabilities or if

there is any derogatory information concerning the patron's credit history.

- (2) Credit bureau contact shall, for the purposes of this subdivision, be considered a verification of the outstanding indebtedness provided by the patron. If a credit bureau contact is not immediately possible, then the Nation Gaming Operation may use an alternative source that has made the required contact. The Nation Gaming Operation shall record the source of verification and the method by which the verification was performed in the patron's credit file.
 - (3) If the credit bureau has information relating to a patron's outstanding indebtedness, then the Nation Gaming Operation shall record this information in the patron's credit file.
- (f) Issuance of Markers. The Nation Gaming Operation shall establish internal control procedures for the computerized or manual issuance of Markers, including, at a minimum, all of the following:
- (1) A designation of the licensed occupational positions that are authorized to issue Markers and a description of their duties;
 - (2) A description of where Markers can be issued;
 - (3) A description of the Marker and the information and signatures required to authorize the Marker. Both of the following provisions specify requirements for a Marker:

- a. The Nation Gaming Operation shall submit the form of its Markers to the SGA, with a copy to the SGO, for written approval prior to its use;
 - b. The form must be a three-part, numbered form;
 - c. The Marker shall include, but not be limited to, all of the following information:
 1. Patron's name and Nation Gaming Operation account number;
 2. Dollar amount of the Marker;
 3. Gaming Facility Marker number;
 4. current time and date;
 5. The required signatures; and
 6. A description of the term of repayment including the rate of interest, if any.
- (4) A description of the distribution of each part of the Marker;
 - (5) Verification of the patron's identity through Photographic Identification credentials before the issuance of the Marker;
 - (6) Verification of available credit;

- (7) A description of the recording of the credit transaction;
 - (8) A description of accountability and control over the Markers;
 - (9) A computer record and computerized log shall be maintained identifying the information in subdivisions (a) to (h) of this rule for not less than seven (7) years; and
 - (10) Other information deemed necessary by the SGA to ensure compliance with the Compact and its Appendices.
- (g) Receipt of payments. The Nation Gaming Operation shall establish internal control procedures to be approved in writing by the SGA in accordance with this subdivision to ensure that all payments received on credit instruments are recorded in a timely fashion. The procedures shall, at a minimum, include all of the following:
- (1) A description of the internal control procedure for processing payments received by the Nation Gaming Operation in any manner;
 - (2) Requirements for the consolidation of Markers;
 - (3) A detailed description of the distribution of all parts of redeemed and consolidated Markers and redemption vouchers; and
 - (4) A detailed allocation of principal and interest on each payment made, if any.

(h) Front Money deposits.

- (1) The Nation Gaming Operation shall establish internal control procedures to be approved in writing by the SGA in accordance with this subdivision in connection with Front Money. The SGA approved internal control procedures in connection with Front Money shall ensure that all applicable currency transaction reporting requirements will be enforced in accordance with applicable state and Federal law.
- (2) Any of the following may be accepted from patrons for the purpose of customer deposits:
 - a. Cash or Cash Equivalent; and
 - b. Value Chips issued by the Nation Gaming Operation.
- (3) Deposits or withdrawals shall be documented on a voucher that is not less than a two-part, numbered form. The voucher shall be completed by the Cage Cashier and shall include, at minimum, all of the following information:
 - a. Patron's name and signature;
 - b. Date of receipt or disbursement;
 - c. Amount of deposit;
 - d. Type of deposit; and
 - e. Cashier's signature.

- (4) The Nation Gaming Operation shall provide, to the SGA a monthly report detailing, at a minimum, all of the following:
 - a. Outstanding credit;
 - b. Checks returned and held;
 - c. Collection activities taken; and
 - d. Settlement of disputed items.

- (5) All of the following checks shall be deposited not later than the business day after the day the checks are received or dated:
 - a. Cashier's checks;
 - b. Money orders;
 - c. Credit card advance checks;
 - d. Traveler's checks; and
 - e. Wire Transfer service checks.

- (6) Personal checks shall be deposited not later than the business day after the day the checks are received or dated, unless otherwise agreed to by the Nation Gaming Operation and the patron, but no later than five (5) business days after the day the checks are received or

dated.

(i) Check Cashing.

(1) The Nation Gaming Operation shall establish internal control procedures to be approved in writing by the SGA in accordance with this section in connection with Cashing checks or drafts by the Nation Gaming Operation. Only the following types of checks may be Cashed by the Nation Gaming Operation:

- a. Personal checks;
- b. Drafts;
- c. Cashier's checks;
- d. Money orders;
- e. Credit card and debit card advance checks;
- f. Traveler's checks; and
- g. Wire Transfers and other kinds of checks approved in writing by the SGA.

(2) For all checks cashed, all of the following procedures shall be followed:

- a. Examine the patron's Photographic Identification and compare the signature on the identification credential to the signature on the check to ensure agreement. If

the signatures do not match, then the Nation Gaming Operation shall not Cash a check for the patron;

- b. Immediately stamp the check "for deposit only";
 - c. Date and time stamp the check;
 - d. Initial the check; and
 - e. Count out, in a tone calculated to be heard by the patron, in full public view and in the view of the surveillance camera, the funds requested by the patron.
- (3) If personal checks are cashed, then the cashier shall perform the procedures outlined in paragraph (2), above, and all of the following additional procedures:
- a. Record the Photographic Identification number if the check is under five hundred dollars (\$500.00) and check-cashing privileges have not been established by the patron;
 - b. Determine if the patron's available credit is sufficient to cover the amount of the personal check, if applicable;
 - c. A personal check may not be cashed if the patron has a balance outstanding, due to checks previously cashed by the Nation Gaming Operation, for more than thirty (30) days; and

- d. A personal check will be held against established credit lines for the earlier of seven (7) days or the date that the check cleared the financial institution upon which it was drawn.
- (j) Handling of returned checks.
- (1) The Nation Gaming Operation shall establish internal control procedures to be approved in writing by the SGA in the same manner as the procedures for extension of credit for the handling of returned checks.
 - (2) A returned check is received and documented on a returned check log by a department independent of the Nation Gaming Operation cage or credit department, or both. If the Nation Gaming Operation uses a check-cashing service, then the Nation Gaming Operation shall establish an internal control procedure for the retention of copies of returned checks.
 - (3) Internal control procedures shall be established for collecting and recording checks returned to the Nation Gaming Operation after deposit, including redeposit procedures.
 - (4) A continuous record of all returned checks shall be maintained by a collections department. The records shall contain all of the following information:
 - a. Original date of the check;
 - b. Name and address of the drawer of the check;

- c. Amount of the check;
 - d. Date the check was dishonored; and
 - e. Date or dates and amount or amounts of any collections received on the check after being returned by a bank.
- (5) A returned check shall be considered the issuance of credit and shall be handled in accordance with the collection of credits.
- (6) Internal control procedures shall be established for notifying the Nation Gaming Operation cage, credit departments, or the equivalent of credit departments of returned checks and of the prohibition from granting further credit to patrons whose checks have been returned and remain unsatisfied.
- (k) Collection of past due accounts.

The Nation Gaming Operation shall establish internal control procedures for the collection of past due Markers and returned checks. The procedures shall be approved in writing by the SGA in the same manner as the extension of credit. Amendments to the internal control procedures shall be approved writing in advance of their effect by the SGA, with a copy to the SGO.

- (l) Write-off of past due accounts. The Nation Gaming Operation shall establish internal control procedures for the write-off of past due Markers and returned checks. The procedures shall be approved in writing by the SGA in the same manner as the extension of credit. The procedures shall, at a minimum, satisfy

both of the following provisions:

- (1) A write-off committee shall be established; and
- (2) Authorize write-off by the write-off committee through internal control procedures, which shall be approved in writing by the SGA. Amendments to the internal control procedures shall be approved in writing by the SGA in advance of their effect, with a copy to the SGO.

35. Presentation of Recognized Credit Card or debit card in exchange for gaming Chips

- (a) The Nation Gaming Operation may, in accordance with the provisions of this section, provide gaming Chips to a patron in exchange for a valid charge or Cash advance in the amount of gaming Chips provided the patron against a Recognized Credit Card account or recognized debit card account maintained by the patron, thereby establishing a valid and enforceable debt owed by the patron. For the purposes of this section, each such exchange shall be known, respectively, as a "credit card Chip transaction" or a "debit card Chip transaction." The Nation Gaming Operation shall display in a conspicuous manner in its Gaming Facility the name or registered credit or debit card logo of each Recognized Credit Card or recognized debit card that may be accepted by the Nation Gaming Operation as part of a credit or debit card Chip transaction.
- (b) Each credit or debit card Chip transaction shall be initiated by a patron presenting a Recognized Credit Card or recognized debit card at a cashier's cage and requesting the purchase of gaming Chips.
- (c) A cage cashier shall perform the procedures and prepare the documents or computer records that are required by the approved System of Internal Controls of the Nation Gaming Operation to evidence a credit or debit card Chip transaction. At a minimum, these procedures and documents or computer records shall enable the Nation Gaming Operation to:
 - (1) Maintain oversight of the transaction at all times by at least two mandatory departments approved, in writing, by

the SGA;

- (2) Create a record of the removal of gaming Chips from the cage inventory, by requiring the creation of a document that identifies the value of the gaming Chips being exchanged, and the reason for their exchange;
 - (3) Maintain an accounting log of each credit or debit card Chip transaction by Shift;
 - (4) Establish a list of the identities and gaming license numbers of its employees who participate in the transactions, a copy of which shall be furnished to the SGA and which shall be updated as changes to such list occur, or at other such times as required by the SGA;
 - (5) Provide a receipt to the patron indicating the amount being charged against the patron's recognized credit or debit card account; and
 - (6) Obtain a valid exemplar of the signature of the patron presenting the recognized credit or debit card.
- (d) Prior to the issuance of gaming Chips to the patron, the cage cashier shall:
- (1) Verify the validity of the patron's recognized credit or debit card by:
 - a. For a credit card Chip transaction, contacting, either directly or through the use of a registered electronic funds transfer company, the issuer of the Recognized

Credit Card;

- b. For a debit card Chip transaction, contacting, either directly the issuer of the recognized debit card or through the use of a registered debit card verification agency which either:
 1. Performs the validation directly based on information supplied to it by the financial institution where the patron maintains the account that is being accessed with the debit card; or
 2. Relays the verification request to the financial institution where the patron maintains the account being accessed with the debit card, which financial institution then validates the card based on its own records;
- (2) Obtain, using the same methods identified in paragraph (d) (1) above, the approval of the issuer of the recognized credit or debit card for a charge or Cash advance against the account of the patron, in an amount that is equal to the value of the gaming Chips requested by the patron;
- (3) Examine the recognized credit or debit card to ensure that a signature appears on the card in the space provided for the signature of the authorized user; and
- (4) Confirm the identity of the presenting patron as the authorized user of the recognized credit or debit card by:

- a. Performing any identification procedures that the issuer of the recognized credit or debit card or, if applicable, the registered electronic funds transfer company or registered debit card verification agency, requires a merchant to follow upon presentation of the card by the cardholder; or
 - b. If the issuer of the recognized credit or debit card or, if applicable, the registered electronic funds transfer company or debit card verification agency does not require a merchant to perform any identification procedures upon presentation of the card by a cardholder, the cage cashier shall compare the signature on the credit or debit card with the signature affixed by the patron on at least one of the documents used by the Nation Gaming Operation to evidence the credit or debit card Chip transaction.
- (e) The Nation Gaming Operation that uses a registered electronic funds transfer company to comply with the requirements of paragraphs (d) (1) and (2) above may, if approved in writing by the SGA in lieu of establishing a direct charge or Cash advance against the credit card account of the patron, permit the registered electronic funds transfer company to establish such direct charge or Cash advance, and accept the check or draft of the registered electronic funds transfer company as being the source of payment for the gaming Chips to be exchanged with the patron. Any check or draft accepted by the Nation Gaming Operation from a registered electronic funds transfer company pursuant to this subsection shall be:
- (1) Processed by the Nation Gaming Operation in accordance with

the requirements of subdivision (d) above;

- (2) Drawn incident to, and as a direct result of, a patron requesting a charge or Cash advance against his or her Recognized Credit Card account in order to obtain gaming Chips as part of a credit card Chip transaction;
 - (3) Made payable to the Nation Gaming Operation or to the patron requesting the transaction and dated with the date of the transaction; and
 - (4) Printed on a machine that is connected telephonically or electronically to the registered electronic funds transfer company and located, at the option of the Nation Gaming Operation, in the cashier's cage, or other secure location approved, in writing, by the SGA.
- (f) After the Cage Cashier completes all documents or computer records required for the processing of the credit or debit card Chip transaction and obtains the endorsement, if required, or signature of the patron presenting the recognized credit or debit card, the Cage Cashier shall retain the document and shall process the document as if it were Cash.
- (g) Unless the procedures of the issuer of the recognized credit or debit card or, as applicable, the registered electronic funds transfer company or registered debit card verification agency, require the confiscation of the recognized credit or debit card presented by the patron, the Cage Cashier shall return the recognized credit or debit card to the patron at the conclusion of the credit or debit card Chip transaction.

- (h) If the Nation Gaming Operation accepts a recognized credit or debit card in a credit or debit card Chip transaction, it shall indicate in its System of Internal Controls the method by which it will notify a patron of the fees, if any, that the Nation Gaming Operation or, as applicable, the registered electronic funds transfer company or registered debit card verification agency, will charge the patron for processing a credit or debit card Chip transaction.

- (i) Any credit or debit card presented by a patron as part of a credit or debit card Chip transaction that has not been signed in the space provided for the signature of the authorized user, or that does not require and has no space for the authorized user to sign the card, shall not qualify as a recognized credit or debit card for purposes of this section, provided, however, that an unsigned card that qualifies as a recognized credit or debit card but for the absence of the signature of the authorized user may be accepted in a credit or debit card Chip transaction if:
 - (1) The issuer of the credit or debit card and, if applicable, the registered electronic funds transfer company or registered debit card verification agency, permits any merchant to which the card is presented to accept the card without the authorized user signing the card before it is presented, and the Nation Gaming Operation follows the procedures established by the issuer of the recognized credit or debit card and, if applicable, the registered electronic funds transfer company or registered debit card verification agency, for accepting the credit or debit card in such circumstances; and

- (2) Either of the following two conditions is satisfied:
- a. The Nation Gaming Operation performs additional steps to verify, in accordance with its approved System of Internal Controls, that the patron presenting the unsigned card is the authorized user of the card, which steps shall include the patron's presenting of a driver's license, or other similar identification card issued by a governmental agency bearing a photograph, from which the Nation Gaming Operation may reasonably conclude that the presenting patron is the person whose photograph is on the identification card. The steps utilized in securing positive identification of the patron shall be recorded in a log to be maintained by the Nation Gaming Operation; or
 - b. The unsigned card is designed to and does include a clear photograph of the face of the authorized user as a permanent part of the card and the Nation Gaming Operation reasonably concludes that the presenting patron is the person whose photograph is on the card.

36. Sending funds by Wire Transfer

- (a) Whenever a patron requests the Nation Gaming Operation to send funds by Wire Transfer to a financial institution on behalf of the patron, the patron shall present to the general cashier the Cash, Cash Equivalents, Gaming Facility check, slot tokens, prize tokens, or Chips representing the amount sought to be transferred, or, in the case of a Cash deposit, request that the unused balance of the Cash deposit be transferred. In the case of a cash deposit, the Nation Gaming Operation's System of Internal Controls for redemption of a Cash deposit shall be observed.

- (b) The general cashier shall obtain from the reserve Cash cashier a Wire Transfer Request Form, a four-part serially prenumbered form, and shall record thereon, at a minimum, the information required by paragraphs (b) (1) through (b) (7) below:
 - (1) The name of the patron;

 - (2) The date of the transaction;

 - (3) The amount of funds to be Wire Transferred, stated in numbers and in words;

 - (4) The source of funds to be transferred (Cash, Cash Equivalent, slot tokens, prize tokens, Gaming Facility check, Chips, or Cash deposit);

 - (5) The name and address of the financial institution to which the funds will be transferred and the account number to which the funds will be credited;

- (6) The signature of the patron if the request is made in person at the cage or, if the request is made by mail, an indication that a signed written request from the patron is attached to the Wire Transfer Request Form;
 - (7) The signature and gaming license number of the general cashier; and
 - (8) The signature and gaming license number of the reserve Cash cashier.
- (c) Prior to completing the Wire Transfer Request Form, the general cashier shall perform and maintain documentation supporting the following verifications:
- (1) If the request is made in person, the general cashier shall compare the patron's signature on the Wire Transfer Request and the patron's physical appearance with:
 - a. The signature and general physical description recorded in a patron signature file; or
 - b. The signature on the patron's identification credential and the patron's photograph or physical description, if any, recorded on the identification credential; or
 - (2) If the request is made by mail, the general cashier shall compare the signature on the attached written request with the signature in a patron signature file.

- (d) After verifying the patron's signature, the general cashier shall present the Wire Transfer Request Form to the reserve Cash cashier, who shall sign the form and retain the original and duplicate copy. The general cashier shall retain the triplicate copy of the form and shall give the patron the quadruplicate copy of the form as evidence of the Wire Transfer request.
- (e) The reserve Cash cashier shall immediately forward the original Wire Transfer Request Form to the Accounting Department as authorization to effect the transfer, and shall retain the duplicate copy for agreement with the triplicate copy held by the general cashier. At the end of the gaming day, and upon agreement of the duplicate and triplicate copies of the Wire Transfer Request Form, the reserve Cash cashier shall forward both copies of the form to the Accounting Department.
- (f) Upon receipt of the original Wire Transfer Request Form, the Accounting Department shall contact the Nation Gaming Operation's bank to authorize the Wire Transfer of the funds and shall either:
 - (1) Record on the original Wire Transfer Request Form:
 - a. The name and title of the person contacted at the Nation Gaming Operation's bank;
 - b. The date and time that the Wire Transfer was authorized; and
 - c. The signature and gaming license number of the Accounting Department employee authorizing the Wire Transfer; or

- (2) If the Wire Transfer is authorized by means of a direct computer link between the Nation Gaming Operation and its bank, print a copy of the Wire Transfer authorization from the computer screen which shall:
 - a. Comply with the requirements of subparagraphs (f) (1) (b) and (f) (1) (c) above; and
 - b. Be attached to the original Wire Transfer Request Form.
- (g) At the end of the gaming day, the Accounting Department shall compare the duplicate and triplicate copies of the Wire Transfer Request Form to the original.

37. Acceptance, verification and accounting for Wire Transfers; Wire Transfer fees

- (a) The Nation Gaming Operation may accept a Wire Transfer of funds to enable the following:
 - (1) Establishment of a Patron Cash Deposit;
 - (2) Redemption of an outstanding Counter Check, Slot Counter Check; or
 - (3) Payment of a returned Counter Check, or Slot Counter Check.

- (b) Any Wire Transfer of funds authorized by this section shall be transferred to and deposited in the Nation Gaming Operation's approved operating account. The Nation Gaming Operation shall require its bank to notify the Nation Gaming Operation of the receipt and deposit of the Wire Transfer by transmitting the information required in paragraphs (c) (2) through (c) (6) below by one or more of the following methods:
 - (1) Direct telephone notification between the Nation Gaming Operation's bank and a cage employee, which notification shall be recorded in the Wire Transfer Log in accordance with paragraphs (c) (6) below;
 - (2) Direct hard copy (printed) communication sent by the Nation Gaming Operation's bank to the Nation Gaming Operation, which document shall be dated, time-stamped and signed by the cage employee receiving the notification, and forwarded to the Accounting Department as supporting documentation in accordance with subdivision (g) below; or

- (3) Direct computer access by the Nation Gaming Operation to the Wire Transfer transaction as it is credited to its operating account at its bank, which transaction shall be printed from the computer screen and dated, time-stamped and signed by the cage employee receiving the notification, and forwarded to the Accounting Department as supporting documentation in accordance with subdivision (g) below.
- (c) Upon notification in accordance with subdivision (b) above that a Wire Transfer of funds has been credited to the Nation Gaming Operation's operating account, the cage employee who received the notice shall record, at a minimum, the following information in the notification section of a Wire Transfer Log maintained in the Main Bank of the cashier's cage or other secure location approved in writing by the SGA within the cage:
- (1) A sequential Wire Transfer number which shall be generated by the Nation Gaming Operation;
 - (2) The date and time of the notification;
 - (3) The name of the Nation Gaming Operation's bank to which the funds were transferred;
 - (4) The actual amount of funds transferred to the operating account of the Nation Gaming Operation, stated in numbers and words;
 - (5) The name of the patron for whose benefit the funds were transferred;

- (6) The method authorized under subdivision(b) above by which the Nation Gaming Operation was notified of the receipt of the Wire Transfer and, if by telephone, the name and title of the person at the Nation Gaming Operation's bank who made the telephone call; and
 - (7) The signature and gaming license number of the cage employee receiving and recording the information required by this subsection.
- (d) Upon completion of the notification section of the Wire Transfer Log required by subdivision (c) above, a Cage Supervisor other than the cage employee who received and recorded notification of the Wire Transfer shall:
- (1) verify receipt of the Wire Transfer and confirm the information recorded in the Wire Transfer Log pursuant to paragraphs (c) (2) through (c) (6) above by:
 - a. If the notification occurred solely by telephone in accordance with paragraphs (b) (1) above, making telephone contact with a previously identified authorized employee of the Nation Gaming Operation's bank; or
 - b. If the notification occurred by direct hard copy communication or by direct computer access in accordance with paragraphs (b) (2) or (b) (3) above, reviewing the hard copy communication or printout of the computer screen; and
 - (2) Record the following in the verification section of the

Wire Transfer Log:

- a. The method of verification, and if verification was accomplished by telephone contact, the name and title of the authorized employee at the Nation Gaming Operation's bank who confirmed the information;
 - b. The date and time of verification; and
 - c. The signature and gaming license number of the Cage Supervisor verifying receipt of the Wire Transfer and the information recorded pursuant to subdivision (c) above.
- (e) Upon verification of the Wire Transfer and completion of the Wire Transfer Log, the general cashier of the Nation Gaming Operation shall be deemed to have received Cash at the general cashier's cage in an amount equal to the actual amount of funds transferred to the operating account of the Nation Gaming Operation.
- (f) Upon determining the purpose for the Wire Transfer, a Cage Supervisor shall prepare a Wire Transfer Acknowledgment Form, a two-part form containing, at a minimum, the following information:
- (1) The Wire Transfer number;
 - (2) The date of the Wire Transfer;
 - (3) The actual amount of funds received pursuant to the Wire Transfer, stated in numbers and words;

- (4) The name of the patron;
 - (5) The purpose for the Wire Transfer (Cash deposit; redemption; payment of returned Counter Check) or Slot Counter Check;
 - (6) The signature and gaming license number of the preparer; and
 - (7) The signature and gaming license number of either:
 - a. The check bank cashier, if the funds are to be used for Counter Check or Slot Counter Check redemption or the payment of a returned Counter Check, Slot Counter Check; or
 - b. The general cashier, if the funds are to be used for a Cash deposit.
- (g) Upon completion of the information required by paragraphs (f) (1) through (f) (6) above, the Cage Supervisor who prepared the form shall obtain the signature required by paragraph (f) (7) above on both copies of the Wire Transfer Acknowledgment Form, transmit the duplicate copy and any supporting documentation to the Accounting Department, and forward the original Wire Transfer Acknowledgment Form to:
- (1) The check bank cashier, if the funds are to be used for Counter Check or Slot Counter Check or redemption or the payment of a returned Counter Check or Slot Counter Check, who shall:

- a. Post the amount of the funds to the patron's credit account;
 - b. If appropriate, return the redeemed Counter Check or Slot Counter Check to the patron;
 - c. Forward to the Accounting Department the original Wire Transfer Acknowledgment Form for comparison to the duplicate; and
 - d. Forward to the Accounting Department the redemption copy of any Counter Check redeemed or Slot Counter Check redeemed; or
- (2) The general cashier, if the funds are to be used to establish a Cash deposit, who shall:
- a. Prepare a customer deposit file;
 - b. Prepare a Customer Deposit Form, except that prior to the release to the patron of any funds credited to a Cash deposit file by means of a Wire Transfer, the general cashier shall verify that the patron is the patron recorded on the Wire Transfer Acknowledgment Form by comparing the signature on an identification credential or the Customer Deposit Form and the patron's physical appearance with the signature and general physical description recorded in a patron signature file and shall maintain documentation supporting that verification; and

- c. Forward to the Accounting Department the original Wire Transfer Acknowledgment Form for comparison to the duplicate.

- (h) At the end of the month, a copy of the Wire Transfer Log shall be forwarded to the Accounting Department and reconciled with all Wire Transfer Acknowledgment Forms prepared during that month.

- (i) Upon the receipt and processing of a Wire Transfer of funds in accordance with the provisions of this section, a Nation Gaming Operation may, in its discretion, credit to the patron's account the amount of any Wire Transfer fees charged against the original amount of the Wire Transfer, provided that:
 - (1) The credit shall be limited to the lesser of two hundred fifty dollars (\$250.00) or the actual amount of the Wire Transfer fees charged by any financial institution involved in the wiring of the funds;

 - (2) The purpose of the Wire Transfer is to enable a transaction identified in paragraphs (a) (2) or (a) (3) above and the credit is applied toward the completion of that transaction;

 - (3) The credit is authorized and recorded by the Nation Gaming Operation pursuant to System of Internal Controls approved by the SGA which internal controls shall, at a minimum, include:
 - a. The creation of a record identifying the date and the amount of the credit and the sequential Wire Transfer

number of the Wire Transfer for which the credit is being issued; and

- b. The recording of the credit as a balancing item on the Main Bank summary.
- (j) Notwithstanding any other provision of this chapter, the amount of a credit of Wire Transfer fees authorized by subdivision (i) above need not be included in determining the amount of Cash complementaries which may be issued to a patron.

indirectly to a patron on behalf of the Nation Gaming Operation by a third party who is affiliated with the Nation Gaming Operation shall be recorded by the Nation Gaming Operation in accordance with the provisions of this section as if the affiliated third party were the Nation Gaming Operation.

- (d) The Nation Gaming Operation shall accumulate both the dollar amount of, and the number of persons provided with, each category of complimentary services or items.
 - (1) A quarterly report shall be filed with the SGA regarding the complimentary services or items provided.
 - (2) The complimentary services shall, at a minimum, be separated into categories for rooms, food, beverage, travel and other services identified, in writing, by the SGA.

- (e) The Nation Gaming Operation shall record, On a Daily Basis, the name of each person provided with complimentary services or items, the category or type of service or item provided, the value (as calculated in accordance with subdivision (c) above) of the service(s) or item(s) provided to such person, and the signature, title or position and gaming license number of the person authorizing the issuance of such services or items. Upon the SGA's request, a copy of this record shall be immediately submitted to the SGA. Excepted from this requirement are the individual names of persons authorizing or receiving:
 - (1) Each non-Cash complimentary service or item which has a value (as calculated in accordance with subdivision (c) above) of fifty dollars (\$50.00) or less;

- (2) Each complimentary Cash gift of fifty dollars (\$50.00) or less; and
- (3) Any complimentary service or item, including a Cash or non-Cash gift, which is issued pursuant to:
 - a. A table game or Gaming Device complimentary incentive program;
 - b. A complimentary program for invited guests;
 - c. A direct mass marketing complimentary program;
 - d. A complimentary distribution program.

Provided such complimentary service or item has a value (as calculated in accordance with subdivision (c) above) of fifty dollars (\$50.00) or less

- (f) Any complimentary service or item, including a complimentary Cash or non-Cash gift, which is issued to a patron as part of a table game or Gaming Device complimentary incentive program shall be subject to the requirements of this subdivision and shall not be included on the daily complimentary report required by subdivision (e) above if:

- (1) The incentive program is prepared prior to implementation, and is maintained as if the program were a complimentary distribution program;
- (2) The program is open to participation by all members of the

38. Granting of complimentary services and items; accounting standards

- (a) A complimentary service or item is a service or item of value provided directly or indirectly by the Nation Gaming Operation at no cost or at a reduced price to a gaming patron.

- (b) The Nation Gaming Operation shall not offer or provide any complimentary service, gift, Cash or other item of value to any person except as authorized by this section. The Nation Gaming Operation shall establish and maintain System of Internal Controls, to be approved in writing by the SGA for the authorization and issuance of complimentary services and items, including Cash and non-Cash gifts. Such System of Internal Controls shall include, without limitation, the procedures by which the Nation Gaming Operation delegates to its employees the authority to approve the issuance of complimentary services and items and the procedures by which conditions or limits, if any, which may apply to such authority are established and modified, including limits based on relationships between the authorizer and recipient, and shall further include effective provisions for audit purposes. Notwithstanding the foregoing:
 - (1) Internal control procedures for transportation expense reimbursement programs shall be subject to the requirements of the section of this Appendix addressing such; and

 - (2) Nothing herein shall be deemed to require the Nation Gaming Operation to identify in its System of Internal Controls the terms or conditions pursuant to which a complimentary service or item may be granted, except as otherwise provided in paragraph (f) (3) below, or to obtain SGA

written approval of any limits or conditions which may be placed on the authority of its employees to approve or issue complimentary services or items; provided, however, that the Nation Gaming Operation shall be required to maintain a written record of all such terms, limits or conditions and the specific titles or positions and gaming license numbers of the employees to whom they apply.

(c) All complimentary services or items shall be recorded as follows:

- (1) A complimentary service or item provided directly to patrons in the normal course of the Nation Gaming Operation's business shall be recorded at an amount based upon the full retail price normally charged for such service or item by the Nation Gaming Operation;
- (2) A complimentary service or item not offered for sale to patrons in the normal course of the Nation Gaming Operation's business, but provided directly by the Nation Gaming Operation to a patron shall be recorded at an amount based upon the actual cost to the Nation Gaming Operation of providing such service or item;
- (3) A complimentary service or item provided directly or indirectly to a patron on behalf of the Nation Gaming Operation by a third party not affiliated with the Nation Gaming Operation, shall be recorded at an amount based upon the actual cost to the Nation Gaming Operation of having the third party provide such service or item;
- (4) A complimentary service or item provided directly or

public;

- (3) Each participant in the program is issued complementaries in accordance with a predetermined schedule, as a result of his or her table game play or slot play which schedule shall, with regard to Cash complementaries, be based on, and shall not exceed, the theoretical win of the Nation Gaming Operation from each participant or the participant's actual loss as reasonably determined from data maintained pursuant to the approved System of Internal Controls for the complimentary incentive program; and
 - (4) As to slot play, a fixed percentage of the player's handle as reasonably determined from data maintained, pursuant to the complimentary incentive program, which percentage may differ for different denominations of Gaming Devices.
 - (5) A record is maintained, in a format approved in writing by the SGA the name of each participant who receives a complimentary service or item as a result of his or her participation in the incentive program, the amount of each complimentary and the type of complimentary, which record shall be made immediately available upon request by the SGA.
- (g) Any complimentary service or item, including a complimentary Cash or non-Cash gift, issued to a patron as part of a direct mass marketing complimentary program, shall not be included on the daily complimentary report required by subdivision (e) above if:
- (1) The complimentary services or items offered pursuant to the

program are less than two hundred dollars (\$200.00) per person, per day, and are offered to at least two hundred fifty (250) persons within thirty (30) days from the implementation of the program;

(2) A record, in a format approved in writing by the SGA which shall be immediately available to the SGA upon request, is maintained identifying:

- a. The date the program was implemented;
- b. The value and type of the complimentary services or items offered pursuant to the program;
- c. The number of persons to whom the complimentary services or items were offered and the date that the offer was made;
- d. The source of the names of the persons to whom the complimentary services or items were offered; and
- e. The names and addresses of the persons to whom more than one hundred dollars (\$100.00) in Cash complementaries were offered.

(h) The Nation Gaming Operation may, subject to the requirements of this subdivision, issue a Cash or non-Cash complimentary to a patron based upon either the occurrence of a predesignated event that may occur in the normal conduct of an Authorized Game, or his or her random selection from among patrons who are playing an Authorized Game. Any complimentary program operated by the Nation Gaming Operation pursuant to this subdivision shall:

- (1) Be open to any member of the public who is playing the Authorized Game at which the complimentary is being offered;
- (2) Not permit the issuance of a complimentary from:
 - a. The table inventory in a table game; or
 - b. The keno writer's drawer in keno.
- (3) Require the establishment and maintenance of a System of Internal Controls preparation of detailed procedures controlling the program, prior to its implementation, which procedures shall be maintained by the Accounting Department, provided, however, that if complementaries will be issued based upon the occurrence of an event that may occur in the normal conduct of an Authorized Game, the Nation Gaming Operation shall submit for SGA approval, in writing, a description of the internal control procedure governing the issuance of a complimentary, at least five (5) days prior to the commencement of the program. Such approval shall be deemed to have been granted if it is not denied, in writing, within the five (5) day period, and, provided, that such internal control procedures shall address, at a minimum:
 - a. The period of time that the program will be offered.
However, nothing herein shall prohibit the Nation Gaming Operation from offering a program for an indefinite period of time, subject to termination upon twenty-four (24) hours notice, in writing, to the SGA

and public, with a copy to the SGO;

- b. The Authorized Game at which the complementaries will be issued;
 - c. The internal control procedures for determining how the winners of the complementaries will be determined;
 - d. A description of the type and value complementaries that will be issued; and
 - e. The procedures by which the Nation Gaming Operation will pay Cash complementaries or deliver non-Cash complementaries;
- (4) Ensure that the information required by subparagraph (i) (3) (a) through (i) (3) (e) above is available to the public in a written form in the Gaming Facility at all times that the complimentary program is being conducted; and
- (5) Not require that any complimentary issued to a patron pursuant to this subdivision be included on the daily complimentary report pursuant to subdivision (e) above, unless the complimentary has a value of more than one thousand dollars (\$1,000.00).
- (i) If a complimentary Cash or non-Cash gift has a value of five hundred dollars (\$500.00) or more, the Nation Gaming Operation shall also:
- (1) Record the address of the recipient;

(2) Verify the identity of the recipient by:

- a. An examination of an identification credential issued by a governmental agency that also contains a photograph or physical description of the recipient that is consistent with the actual appearance of the patron;
- b. Obtaining the patron's signature and comparing it and the patron's physical appearance to the signature and general physical description in a patron signature file; or
- c. A personal attestation by an authorized employee, which may include an attestation made after a telephone call to the recipient of the gift, or the receipt of a document signed by the recipient acknowledging the receipt of the gift; and

(3) Record the method of verification.

- (j) Notwithstanding any inconsistent provision of this section, the Nation Gaming Operation shall not permit any employee to authorize the issuance of a complimentary Cash or non-Cash gift with a value of ten thousand dollars (\$10,000.00) or more unless the employee is licensed and functioning as a gaming license level three holder and the authorization is co-signed by a second employee licensed and functioning as a key employee.
- (k) If the Nation Gaming Operation provides complimentary Cash and complimentary item gifts worth ten thousand dollars (\$10,000.00)

or more to a person or his or her guests within any five (5) day period, the Nation Gaming Operation shall record the reason why such gifts were provided and maintain such records available for inspection by the SGA upon request.

- (l) The Nation Gaming Operation shall submit to the SGA a report listing each person who has received ten thousand dollars (\$10,000.00) or more in complimentary Cash and complimentary item gifts within any five (5) day period ending during the preceding month. Such report shall be filed by the last business day of the following month and shall include the total amount of complimentary Cash or non-Cash gifts provided to each person.

- (m) The Nation Gaming Operation shall not provide to any patron, during any twelve (12) month period, complimentary Cash gifts which exceed the greater of:
 - (1) The Nation Gaming Operation's theoretical win from that patron during that same twelve (12) month period, as reasonably determined from data contained in the player rating system of the Nation Gaming Operation; provided, however, that the Nation Gaming Operation shall include in its System of Internal Controls procedures, the mathematical formula by which it calculates its theoretical win from the information contained in its player rating system; or

 - (2) The actual gaming losses of the patron to the Nation Gaming Operation during that same twelve (12) month period as reasonably determined from data contained in the player rating system of the Nation Gaming Operation.

- (n) If the Nation Gaming Operation purchases a non-Cash gift for the direct or indirect benefit of a patron it shall require the entity from which the gift is purchased to deliver the gift directly to either the Nation Gaming Operation or the patron. The Nation Gaming Operation shall also require the entity to pay to the Nation Gaming Operation directly any refund or Cash balance generated by the return or exchange of the gift by the patron or any representative of the patron.

- (o) Notwithstanding any other provisions of this section, the Nation Gaming Operation which intends to provide a complimentary Cash gift to a patron, upon receipt of a written request from the patron and in accordance with the System of Internal Controls approved in writing by the SGA to credit the Cash complimentary directly to:
 - (1) The payment of any outstanding Counter Checks issued by the patron and held by the Nation Gaming Operation;
 - (2) The payment of any returned checks issued by the patron and held by the Nation Gaming Operation; or
 - (3) The establishment or enhancement of a Cash deposit held for the benefit of the patron.

- (p) The written request required pursuant to subdivision (p) above shall be attached to documentation of the Cash complimentary gift maintained by the Nation Gaming Operation pursuant to its approved System of Internal Controls.
 - (l) The written request shall include, at a minimum, the

following:

- a. The date of the request;
 - b. The name and address of the patron;
 - c. Instructions as to the use to which the Cash complimentary is to be credited; and
 - d. The signature of the patron.
- (2) Prior to the crediting of any complimentary Cash gift to the payment of an outstanding Counter Check or returned check, the general cashier or check cashier shall verify that the signature of the patron on the request agrees with the signature of the patron in a patron signature file.
- (q) In instances where complimentary services or item have been issued by or on behalf of the Nation Gaming Operation, Federal income reporting requirements regarding income and gifts shall be adhered to.

39. Control of promotional coupon redemption and other complimentary distribution programs

- (a) For the purposes of this section, a complimentary distribution program is a contest or promotion in which complimentary services or items are provided directly or indirectly by the Nation Gaming Operation to the public, without regard to the identity or level of gaming activity of the individual recipients. The procedures contained in subdivisions (c) through
- (t) below shall apply the Nation Gaming Operation if offering promotional coupon redemption complimentary distribution programs which entitle patrons to use match play promotional coupons or to redeem promotional coupons for complimentary Cash or gaming Chips or slot tokens, issued in connection with bus and other complimentary distribution programs. No match play promotional coupons, complimentary Cash or gaming Chips or slot tokens may be distributed by the Nation Gaming Operation under any promotional coupon redemption complimentary distribution program that does not comply with the requirements of this section. Detailed internal control procedures controlling complimentary distribution programs regulated by subdivisions (c) through (t) below shall be prepared prior to implementation and maintained by the Accounting Department. Such written procedures shall be approved in writing to the SGA, with a copy to the SGO.
- (b) Detailed internal control procedures controlling all complimentary distribution programs entitling patrons to complimentary Cash not regulated by subdivision (a) above, shall be submitted to and approved in writing by the SGA, with a copy to the SGO, prior to implementation of the programs and shall be maintained by the Accounting Department. Complimentary items or

services, including Cash, distributed through programs regulated by this subsection shall be reported in accordance with the procedures contained in subdivisions (m) and (o) below.

- (c) Each promotional coupon or part thereof issued by the Nation Gaming Operation directly or through an authorized registrant shall only be redeemable for a specific amount of Cash or gaming Chips.
- (d) All promotional coupons issued pursuant to this section shall contain a serial number and each series of such promotional coupons shall be issued in sequential order. Each promotional coupon shall be printed with a description of what is being offered, the location where the promotional coupon may be redeemed, and either a statement specifying the date on which the promotional coupon becomes invalid or some other means to indicate the date when a promotional coupon becomes invalid. If a promotional coupon is of a type that is divisible into sections or is multipart, each such separate part, or copy, shall contain the information required by this subsection.
- (e) The provisions of this subdivision and subdivisions (f) through (h) and (k) below shall only apply to promotional coupons that will be distributed directly to patrons by the Nation Gaming Operation. Promotional coupons received by the Nation Gaming Operation from a manufacturer or distributor or produced internally by the Nation Gaming Operation pursuant to subdivision (t) below shall be opened and examined by at least one member of the Accounting Department. Any deviations between the invoice or control listing accompanying such promotional coupons, the purchase or requisition order, and the actual promotional coupons received, shall be reported promptly to the

Supervisor of the Accounting Department, or a higher authority in a direct reporting line and the Internal audit department, as approved in writing by the SGA, with a copy to the SGO.

- (1) Upon examination of the promotional coupons received, the Nation Gaming Operation shall cause to be recorded in a Promotional coupon Control Ledger the type and quantity of promotional coupons received, the date of such receipt, the beginning serial number, the ending serial number, the new quantity of unissued promotional coupons on hand, the purchase order or requisition number, any deviations between the number of promotional coupons ordered and received and the signature and gaming license number of any individual who examined such promotional coupons.
 - (2) All unissued promotional coupons shall be stored in a secured and locked area approved in writing by the SGA controlled by an Accounting Department Supervisor.
 - (3) A representative from the Accounting Department shall prepare a monthly inventory of unissued promotional coupons. Any deviations between the promotional coupon inventory and the Promotional coupon Control Ledger shall be reported to the Gaming Facility Manager, Gaming Facility controller and the SGA, with a copy to the SGO.
 - (4) For purposes of this section, "Accounting Department" shall be deemed to refer to any licensed accounting personnel employed by the Nation Gaming Operation who report in a direct line to the Supervisor of the Accounting Department.
- (f) A representative of the Nation Gaming Operation shall estimate

the number of promotional coupons needed, by Shift, each day. An Accounting Department representative shall obtain the quantity of such promotional coupons to be issued. If a date indicating when the promotional coupon becomes invalid is not preprinted thereon, the Accounting Department representative shall affix a stamp indicating the date the promotional coupon becomes invalid or shall issue color-coded promotional coupons, the colors of which indicate the date that the promotional coupons become invalid. The following, at a minimum, shall be recorded in the Promotional coupon Control Ledger:

- (1) The date the promotional coupons were issued;
- (2) The type of promotional coupons issued;
- (3) The beginning serial number of such promotional coupons issued;
- (4) The ending serial number of such promotional coupons issued;
- (5) The quantity issued and the quantity remaining; and
- (6) The signature and gaming license number of each Accounting Department representative issuing the promotional coupons and each other department's representative receiving the promotional coupons.

(g) The Nation Gaming Operation shall require unused promotional coupons obtained from the Accounting Department representative to be stored in a locked cabinet in a location approved in writing by the SGA until such coupons are distributed to

patrons. Any promotional coupons remaining unused at the end of a Shift shall either be returned to the Accounting Department for receipt and redistribution, or kept for use by the following Shift, provided accountability between Shifts is maintained in accordance with procedures approved in writing by the SGA. All expired promotional coupons must be returned to the Accounting Department On a Daily Basis. Any promotional coupons that are not used by the date indicated on the promotional coupons when they become invalid, shall be voided when returned to the Accounting Department.

- (h) Written documentation, as required by the SGA, shall be prepared by a representative of the Nation Gaming Operation for the distribution of promotional coupons to patrons. The documentation shall contain the following information, at a minimum:
 - (1) The date, time and Shift of preparation;
 - (2) The type of promotional coupons used;
 - (3) The beginning serial number of such promotional coupons used;
 - (4) The ending serial number of such promotional coupons used;
 - (5) The total number of such promotional coupons used;
 - (6) Independent, written verification of the number of people receiving such promotional coupons, e.g. , bus driver's manifest;

- (7) The total number of such promotional coupons remaining for use by the next Shift, or returned to the Accounting Department; and
 - (8) The signature(s) and gaming license number(s) of the Nation Gaming Operation's representative(s) who distributed such promotional coupons.
- (i) Each promotional coupon redeemable for gaming Chips, match play promotional coupon and progressive Wager promotional coupon shall be designed and printed so that the denomination and type of promotional coupon is clearly readable from the closed circuit television system when accepted or being wagered at a Gaming Table, and when deposited into a Drop Box. A match play promotional coupon shall contain an area designated for the placement thereon of the required gaming Chips, which area shall be located on the promotional coupon so as not to obscure or interfere with visibility of the type and denomination of the promotional coupon. The Nation Gaming Operation shall not issue or use a match play promotional coupon or a progressive Wager promotional coupon for gaming purposes, until a sample promotional coupon has been submitted to, and approved in writing, by the SGA.
- (j) Promotional coupons shall be redeemed in the following manner:
- (1) Promotional coupons redeemable for coin, slot tokens or currency shall only be redeemed by changepersons, at the slot or keno booths, or at the cashier's cage. A changeperson, slot cashier, or general cage cashier shall accept such promotional coupons in exchange for the stated amount of Cash or slot tokens, or a keno writer shall

accept the promotional coupons in exchange for the stated amount of Cash, slot tokens or keno ticket, and shall cancel such promotional coupons upon acceptance. Cancellation of promotional coupons by changepersons shall be performed in a manner that will permit subsequent identification of the individual who accepted and canceled the promotional coupon. Redeemed promotional coupons shall be maintained by the general cashier or keno writer, and shall be exchanged with the Main Bank at the conclusion of gaming activity each day, at a minimum.

- (2) A promotional coupon redeemable for gaming Chips shall be redeemable only at a Gaming Table, and only by a Dealer or Boxperson, who shall accept such promotional coupon in exchange for the stated amount of gaming Chips, and shall deposit the promotional coupon into the Drop Box, upon acceptance
- (3) A match play promotional coupon shall be redeemable only at a Gaming Table except for the Pass and Don't Pass Wagers in craps, and the Red, Black, Odd, Even, 1-18, 19-36, 1st 12, 2nd 12, and 3rd 12 Wagers in roulette, which has an individual betting area for each player on the Gaming Table Layout. Such a promotional coupon shall be redeemed only by a Dealer, and only if accompanied by the proper amount of gaming Chips required by such promotional coupon. The Dealer shall accept the Match Game Coupon as part of the patron's Wager, and shall deposit such promotional coupon into the Drop Box after the Wager is won or lost.
- (4) A progressive Wager promotional coupon shall be redeemable only at an Authorized Game offering progressive Payout

Wagers. Such a promotional coupon shall be redeemable only by a Dealer. The Dealer shall redeem the progressive Wager promotional coupon by placing a Chip from the table inventory container that is equal in value to the progressive Wager promotional coupon into the progressive Wager acceptor device, and deposit the progressive Wager promotional coupon immediately into the Drop Box.

- (k) When unused and expired promotional coupons are returned to the Accounting Department, a representative of the Accounting Department shall record the following information in the Promotional coupon Control Ledger:
 - (1) The date the promotional coupons were returned;
 - (2) The type of promotional coupons returned;
 - (3) The beginning serial number of such promotional coupons returned;
 - (4) The ending serial number of such promotional coupons returned;
 - (5) The quantity returned and the quantity remaining; and
 - (6) The signature(s) and gaming license number(s) of the Accounting Department representative(s) receiving the returned unused promotional coupons, and such other department's representative(s) returning the promotional unused coupons.
- (1) All documentation, unused promotional coupons, voided

promotional coupons, promotional coupons returned by the post office, and redeemed promotional coupons maintained in conformity with subdivisions (g), (h), (i) and (j) above and (p}

and (q) below, shall be forwarded On a Daily Basis to the Accounting Department, where they shall be:

- (1) Reviewed for propriety of signatures on documentation and for proper cancellation of all promotional coupons;
- (2) Recounted and examined for proper calculation, summarization and recording on documentation, including, without limitation, the Master Game Report;
- (3) Reconciled by:
 - a. The total number of promotional coupons given to representatives of the department making distribution to patrons, the number returned for reissuance, the number distributed to patrons, voided, the number returned by the post office and the number redeemed; or
 - b. The total number of promotional coupons mailed by an authorized registrant, the number returned by the post office and the number redeemed;
- (4) Subsequently recorded; and
- (5) Maintained and controlled by the Accounting Department until destruction of the promotional coupons is approved in writing by the SGA.

(m) The Nation Gaming Operation shall:

(1) Prepare a quarterly report for all programs regulated by subdivision (a) above, which shall list, by type of promotional coupon, the total number of such promotional coupons used, the total number of promotional coupons redeemed, the total value of the complimentary Cash, gaming Chips, slot tokens, match play promotional coupons or progressive Wager promotional coupons given to patrons in redemption of promotional coupons and any liability to patrons remaining on unredeemed promotional coupons, which report shall be provided to the SGA, with a copy to the SGO; and

(2) Prepare a quarterly report for all programs regulated by subdivision (b) above, which shall list, by program offered during the quarter, a description of the complimentary items and services provided, the total number of persons receiving complimentary items or services, the total dollar amount of complimentary items or services provided, and the names of all persons receiving a complimentary item or service in a dollar amount greater than one thousand dollars (\$1,000.00). Such report shall be provided to the SGA, with a copy to the SGO.

(n) The report shall be signed by the Gaming Facility controller, or a higher authority in a direct reporting line, indicating that no material discrepancies were noted for the period covered by the report or if a material discrepancy is noted it shall be explained in detail.

(o) In addition to the reports required in subdivision (m) above,

the Nation Gaming Operation shall accumulate both the dollar amount of and the number of persons redeeming promotional coupons pursuant to subdivision (a) above, and the dollar amount of and the number of persons receiving complimentary items or services pursuant to subdivision (b) above, and shall include this information on quarterly complimentary report. Complimentary items or services, including match play promotional coupons and progressive Wager promotional coupons, Cash, slot tokens and gaming Chips distributed through programs regulated by this section shall not be subject to the daily complimentary reporting requirements.

- (p) If the Nation Gaming Operation intends to mail promotional coupons regulated by subdivision (a) above directly to its patrons, it shall not be required to comply with the requirements of subdivision (h) above, but shall be required to include the following additional procedures, at a minimum, in its internal controls:
 - (1) The Nation Gaming Operation shall prepare and maintain in its computer system, for the time period during which the promotional coupon is valid, a list of each patron to whom a promotional coupon shall be mailed, which list shall include, at a minimum, the following information:
 - a. The patron's name;
 - b. The patron's address;
 - c. The patron's identification number;
 - d. The promotional coupon denomination;

- e. The promotional coupon expiration date; and
 - f. A unique promotional coupon serial number unique to each promotional coupon, name or approved which shall include a method of identifying the Nation Gaming Operation issuing such promotional coupon.
- (2) Each promotional coupon issued pursuant to this subsection shall include a bar code or magnetic strip that will enable the Nation Gaming Operation's computer system to identify the information required by paragraph (p) (1) above.
 - (3) The information required by paragraph (p) (1) above shall be provided to the Accounting Department, which shall maintain this information for purposes of the reconciliation required by subdivision (1) above.
 - (4) The envelopes used to mail the promotional coupons shall include the Nation Gaming Operation's address as the return address and shall request the return of the envelope to the sender if not deliverable to the addressees. The return of any promotional coupon by the post office shall be recorded by the Nation Gaming Operation in its computer system.
 - (5) Prior to the redemption of a promotional coupon issued pursuant to this paragraph, or upon electronic cancellation pursuant to subdivision (r) below, the Nation Gaming Operation shall be required to verify the validity of such promotional coupon by comparing the information maintained in its computer system pursuant to paragraph (p) (1) above or a control number, which is derived from the patron's

identification number and the promotional coupon's serial number, with the information or control number recorded in the promotional coupon's bar code or magnetic strip. This verification of the information required in paragraph (p) (1) above may be performed electronically. The Nation Gaming Operation shall not redeem any promotional coupon unless the Nation Gaming Operation also confirms that:

- a. The promotional coupon has not expired; and
 - b. The promotional coupon has not been previously redeemed.
- (6) Prior to redemption of any promotional coupon with a value of more than one hundred dollars (\$100.00) issued pursuant to this subsection, the Nation Gaming Operation shall be required to verify, through signature and/or photograph identification card verification, the identity of the patron, in order to confirm that he or she is the person to whom such promotional coupon was mailed.
- (7) All promotional coupons issued pursuant to this subsection shall be redeemed in accordance with subdivision (j) above, and shall be electronically canceled in the Nation Gaming Operation's computer system immediately upon redemption, or in accordance with subdivision (r) below, so as to preclude subsequent redemption of the same promotional coupon. On a Daily Basis, a report shall be generated of all promotional coupons that are electronically canceled. This report shall contain, at a minimum, a list of the serial numbers of the canceled promotional coupons, and shall be forwarded, On a Daily Basis, to the Accounting Department

for purposes of the reconciliation required by subdivision. (1) above.

- (q) If the Nation Gaming Operation intends to authorize a gaming service registrant to print and mail promotional coupons regulated by subdivision (a) above directly to the Nation Gaming Operation's patrons, it shall be required to comply with the provisions of paragraphs (p) (1) through (p) (7) above, and shall include the following additional procedures, at a minimum, in its approved System of Internal Controls:
- (1) The Nation Gaming Operation shall provide the gaming service registrant via electronic or magnetic tape medium, a list of the information required by (p) (1) above for each patron to whom a promotional coupon shall be mailed.
 - (2) The gaming service registrant shall print promotional coupons only for the patrons authorized by the Nation Gaming Operation, pursuant to paragraph (q)(1) above. Within forty-eight (48) hours of mailing any such promotional coupons, the gaming service registrant shall provide documentation to the Accounting Department regarding the promotional coupons that were printed and mailed. This documentation shall include the serial numbers of the promotional coupons that were printed and mailed and a representation, signed by qualifier of the gaming service registrant, that only the promotional coupons requested by the Nation Gaming Operation were printed and mailed and that any misprints were destroyed.
 - (3) The gaming service registrant may include material other than the promotional coupon in the mailing, if authorized

by in writing by the Nation Gaming Operation, the SGA.

- (4) The Nation Gaming Operation shall develop procedures for reconciling the total number of promotional coupons authorized for issuance by the Nation Gaming Operation pursuant to paragraph (q) (1) above, to the total number of such promotional coupons mailed by the gaming service registrant, returned by the post office and redeemed by patrons, and shall calculate the daily outstanding liability of the Nation Gaming Operation for unredeemed promotional coupons issued pursuant to this subsection.

- (r) Notwithstanding paragraphs (p) (5) and (7) above, the Nation Grming Operation may accept a promotional coupon which has been mailed to a patron without first verifying its validity, and without immediately canceling the promotional coupon electronically in the computer system, if:
 - (1) The value of such promotional coupon is one hundred dollars (\$100.00) or less;
 - (2) Such promotional coupon is redeemed by a general cashier or a Dealer at a Gaming Table;
 - (3) The general cashier or Dealer verifies the expiration date contained on such promotional coupon and confirms that such promotional coupon has not expired;
 - (4) Such promotional coupon is physically canceled in a manner approved, in writing, by the SGA and is physically segregated and secured until verified and electronically canceled; and

- (5) Such promotional coupon is verified in the computer system, pursuant to paragraphs (p) (1) and (5) above, and is electronically canceled in the system within eight (8) hours of acceptance, provided, however, that a promotional coupon accepted by a Dealer at a Gaming Table and deposited into that table's Drop Box may be verified and canceled when it is removed from the Drop Box.
- (s) The Nation Gaming Operation may, through its management information systems department or any other department, as approved in writing by the SGA internally manufacture or print promotional coupons that are governed by suboivision (a) above, provided that the System of Internal Controls governing the production and subsequent reconciliation of such promotional coupons are submitted, to and approved in writing, by the SGA.

40. Acceptance of Cash and promotional coupons at Gaming Tables

- (a) Whenever Cash or a promotional coupon is presented by a patron at a Gaming Table for exchange for gaming Chips:
 - (1) The Cash or promotional coupon shall be spread on the top of the Gaming Table by the Dealer or Boxperson accepting it in full view of the patron who presented it and the Gaming Facility Supervisor assigned to such Gaming Table;
 - (2) The amount of the Cash or promotional coupon shall be announced orally by the Dealer or Boxperson accepting it in a tone of voice calculated to be heard by the patron who presented it and the Gaming Facility Supervisor assigned to such Gaming Table; and
 - (3) Immediately after an equivalent amount of gaming Chips has been given to the patron, the Cash or promotional coupon shall be taken from the top of the Gaming Table and deposited by the Dealer or Boxperson into the Drop Box attached to the Gaming Table.

- (b) Whenever a Match Game Coupon and gaming Chips are presented as a Wager by a patron at an Authorized Game in which a Match Game Coupon may be used:
 - (1) The Match Game Coupon shall be placed underneath the gaming Chips wagered by the patron and positioned as follows:
 - a. For all games other than craps or roulette, in the patron's betting area;

- b. For craps, either on the Pass Line or Don't Pass Line;
or
 - c. For roulette, in one of the betting spaces marked
"Black," "Red," "Odd," "Even," "11-18," "19-36," "1st
12," "2nd 12," or "3rd 12;"
- (2) The Chips shall be placed on the coupon in such a way that the type and value of the coupon shall be visible at all times;
- (3) If the Chips wagered by the patron are greater in value than the stated value of the Match Game Coupon, the Dealer shall "break down" the Wager by placing an amount of Chips equal to the stated value of the Match Game Coupon directly on the Match Game Coupon, and shall place the remainder of the Chips wagered by the patron next to the Match Game Coupon; provided, however, that if the value of the Chips wagered by the patron will not permit the Dealer to break down the Wager in accordance with this paragraph, the Dealer shall:
- a. For Value Chips, exchange one or more of the patron's Chips for Chips in other denominations obtained from the table inventory container, that:
 - 1. Are equal in total value to the patron's Chips that are being exchanged; and
 - 2. Will permit the required breakdown of the patron's Wager;

- b. For Non-Value Chips, convert the value of the patron' s Chips to a value that will permit the required breakdown of the Wager.
 - (4) Only one Match Game Coupon may be used with the Wager;
 - (5) If the Wager wins, it shall be paid in accordance with the terms and conditions of the coupon; and
 - (6) Whether the Wager wins or loses, the coupon shall be deposited by the Dealer into the Drop Box attached to the Gaming Table at the time the winning Wager is paid or the losing Wager is collected.
- (c) Whenever a progressive Wager coupon is presented by a patron at an Authorized Game in which a progressive Payout Wager coupon may be used, the Dealer shall:
- (1) Comply with the procedures set forth in subdivisions (a) (1) and (a) (2) above;
 - (2) Remove from the table inventory container a Chip that is equal in value to the value of the progressive Wager coupon, place the Chip in the progressive Wager acceptor device and prohibit the patron from withdrawing such progressive Payout Wager;
 - (3) Immediately after placing the Chip in the progressive Wager acceptor device, take the coupon from the top of the Gaming Table and deposit it in the Drop Box attached to the Gaming Table; and

- (4) Permit only one progressive Wager coupon to be used by a patron per hand.

- (d) The Nation Gaming Operation or management contractor may, in its discretion, require that a coupon be canceled upon acceptance by the Dealer or Boxperson, in a manner approved in writing by the SGA, so as to preclude its subsequent use.

41. Cashier's cage standards; satellite cages standards

- (a) The Nation Gaming Operation shall have on or immediately adjacent to the gaming floor a physical structure known as a cashier's cage (cage) to house the cashiers and to serve as the central location in the Gaming Facility for the following:
 - (1) The custody of the cage inventory comprising currency including patrons' deposits, coin, Patron Checks, gaming Chips, slot tokens, promotional coupons, gift certificates and of forms, documents, and records normally associated with the operation of a cage;
 - (2) The approval, exchange, redemption, and consolidation of Patron Checks received for the purposes of gambling in conformity with the Compact and its Appendices;
 - (3) The receipt, distribution, and redemption of gaming Chips, slot tokens, and plaques in conformity with the Compact and its Appendices; and
 - (4) Any other function normally associated with the operation of a cage.

- (b) The cage shall be designed and constructed to provide maximum security for the materials housed therein and the activities performed therein; such design and construction shall be, at a minimum, as effective as the following:
 - (1) Fully enclosed except for openings through which materials such as gaming Chips, Patron Checks, slot tokens, Cash, Cash Equivalents, records, and documents can be passed to

service the public and the Gaming Tables;

- (2) Manually triggered silent alarm systems for the cage, its ancillary office space and any related Nation Gaming Operation vault, which systems shall be connected directly to the Surveillance Department and the security department; and
- (3) Double door entry and exit system that will not permit a person to pass through the second door until the first door is securely locked. In addition:
 - a. The first door adjacent to the gaming floor of the double door entry and exit system shall be controlled by the security department. The second door of the double door entry and exit system shall be controlled by the cashier's cage;
 - b. The system shall have closed circuit television coverage which shall be monitored by the security department and Surveillance Department; and
 - c. Any entrance to the cage that is not a double door entry and exit system shall be an alarmed emergency exit door only that shall automatically trigger a silent alarm system connected directly to the Surveillance Department and security department.
- (4) Separate locks on each door of the double door entry and exit system, the keys to which shall be different from each other.

- (c) The Nation Gaming Operation may also have one or more "satellite cages" separate and apart from the cashier's cage, but within the Gaming Facility, established to maximize security, efficient operations, or patron convenience and comfort and designed and constructed in accordance with subdivision (b), above. Subject to written SGA approval, a satellite cage may perform any or all of the functions of the cashier's cage. The functions which are conducted in a satellite cage shall be subject to the applicable accounting controls set forth in the Compact and its Appendices.
- (d) The Nation Gaming Operation shall file with the SGA the names of all persons possessing the keys to the locks securing the entrance to the cage, any satellite cages, as well as all persons possessing the ability to operate alarm systems for the cage and any satellite cages.
- (e) The Nation Gaming Operation shall have a reserve Cash bankroll in addition to the imprest funds normally maintained by the cage on hand in the cage or readily available to the cage at the opening of every Shift in a minimum amount established by the Nation Gaming Operation and approved in writing by the SGA.

42. Opening, counting and recording the contents of Drop Boxes and Slot Cash Storage Boxes and the recording of keno revenue

- (a) The contents of the Drop Boxes and Slot Cash Storage Boxes shall be counted and recorded in the Count Room in conformity with this section.
- (b) The Nation Gaming Operation shall place on file with the SGA, with a copy to the SGO, the specific times during which the Drop Boxes are to be removed from Gaming Tables and the specific times during which the contents of the Drop Boxes and Slot Cash Storage Boxes are to be counted and recorded. Drop Boxes shall be removed from Gaming Tables and counted and recorded, at a minimum, once each gaming day, provided, however, a Drop Box need not be so removed if:
 - (1) The Drop Box is from a Gaming Table that was never opened for gaming on that gaming day; and
 - (2) The System of Internal Controls procedures, as approved in writing by the SGA, ensure that the security department is notified of which Drop Boxes to collect and the Count Room Supervisor is notified of which Drop Boxes shall be counted.
- (c) The opening, counting, and recording of the contents of Drop Boxes and Slot Cash Storage Boxes shall be performed in the presence of a SGA Inspector and an gaming license holder level three who shall be referred to herein as a Count Room Supevisor. To gain entrance to the Count Room, the SGA Inspector shall present an official identification card containing his or her photograph issued by the SGA.

- (d) All persons present in the Count Room during the counting process, except representatives of the SGA, if applicable, shall wear as outer garments, only a full-length, one-piece pocketless garment with openings only for the arms, feet, and neck.

- (e) No person present shall:
 - (1) Carry a pocketbook or other container unless it is transparent; or

 - (2) Remove his or her hands from or return them to a position on or above the Count table unless both the backs and palms of his or her hands are first held straight out and exposed to the view of other members of the Count team and the closed circuit television camera.

- (f) Immediately prior to the commencement of the Count:
 - (1) The doors to the Count Room shall be securely locked;

 - (2) A Count team member shall notify a person assigned to the Surveillance Department closed circuit television monitoring room that the Count is about to begin, after which such person shall make an audio-video recording, with the time and date inserted thereon, of the entire counting process, which recording shall be retained by the Surveillance Department for at least twenty-one (21) days from the date of recordation unless otherwise directed in writing by the SGA; and

 - (3) The Count Room Supervisor or his or her Supervisor shall

notify the SGA Inspector, in writing, of the name and gaming license number of each person who shall participate in the counting process and whether each such individual is scheduled to:

- a. Be present in the Count Room during the entire counting process;
 - b. Enter the Count Room during the counting process; or
 - c. Leave the Count Room prior to the conclusion of the counting process.
- (g) No person other than the SGA Inspector shall be permitted to enter or leave the Count Room during the counting process, except in an emergency, unless his or her name is on the written notice required by subparagraph (f) (3) (a) and subdivision (f) above.
- (1) If the Nation Gaming Operation permits a member of the Count team to enter or leave the Count Room during the counting process, any employee remaining in the Count Room shall be required to display his or her hands in accordance with subdivision (e) above and to step away from the Count table until the Count team member has entered or left the Count Room.
 - (2) The counting and recording process shall be discontinued whenever less than three (3) Count team members are present in the Count Room.
 - (3) Once the counting process has been started, the Count Room

Supervisor shall be required to notify the Surveillance Department closed circuit television monitoring room whenever a Count Room door will be opened, prior to the opening of such room.

- (h) Procedures and requirements for conducting the Count shall be as follows:
- (1) As each Drop Box or Slot Cash Storage Box is placed on the Count table, one Count team member shall orally announce, in a volume of voice to be heard by all persons present and to be recorded by the audio recording device, the game, table number, and Shift marked thereon for Drop Boxes or Slot Cash Storage Boxes;
 - (2) In full view of the closed circuit television cameras located in the Count Room, the contents of each Drop Box or Slot Cash Storage Box shall be emptied on the Count table and either manually counted separately on the Count table or counted on a currency or promotional coupon counting machine which has been approved in writing by the SGA and is located in a conspicuous location on, near or adjacent to the Count table;
 - (3) Immediately after the contents of a Drop Box are emptied onto the Count table, the inside of the Drop Box or Slot Cash Storage Box shall be held up to the full view of a closed circuit television camera and shall be shown to the SGA Inspector to assure that all contents of the Drop Box or Slot Cash Storage Box have been removed. The Drop Box shall then be locked and placed in the storage area for Drop Boxes approved by the SGA;

- (4) The contents of each Drop Box or Slot Cash Storage Box shall be segregated by a Count team member into separate stacks on the Count table by each denomination of coin, currency and promotional coupon, and by type of form, record or document, except that the SGA may permit the utilization of a machine to sort currency or promotional coupons automatically by denomination;

- (5) Each denomination of coin, token, currency and promotional coupon shall be counted separately by one Count team member who shall place individual bills, coins and promotional coupons of the same denomination on the Count table in full view of a closed circuit television camera, after which the coin, currency and promotional coupons shall be counted by a second Count team member who shall be unaware of the result of the original Count and who, after completing this second Count, shall confirm the accuracy of the total, either verbally or in writing, with that reached by the first Count team member, except that the SGA may permit the Nation Gaming Operation to perform aggregate Counts by denomination of all currency and promotional coupons collected in substitution of the second Count by Drop Box or Slot Cash Storage Box, if the SGA are satisfied that the original Counts are being performed automatically by a machine that counts and automatically records the amount of currency or promotional coupons, and that the accuracy of the machine has been suitably tested and proven. The SGA will permit the utilization of currency and promotional coupon counting machines if prior to the start of the first use of the counting machine each gaming day, except for subparagraphs (h) (5) (a) and (b) below, which shall be

performed prior to each Count, and except when a SGA Inspector may direct the testing of an automatic counting machine prior to each Count, in the presence of a SGA Inspector, the Count Room Supervisor shall:

- a. Verify that the counting machine has a zero balance on its terminal unit display panel and has a receipt printed which denotes "-0- Cash or promotional coupons on hand" and "-0- notes or promotional coupons in machine," or some other means to indicate that the machine has been cleared of all currency and promotional coupons.
- b. Visually check the counting machine to be sure there are no bills or promotional coupons remaining in the various compartments of the machine.
- c. Supervise a Count team member who shall randomly select a Drop Box or Slot Cash Storage Box and place the entire contents of that Drop Box into the first counting machine, which shall Count the currency or promotional coupons by denomination and produce a print out of the total amount of currency or promotional coupons by denomination. Any soiled or off-sorted bills or promotional coupons shall be re-fed into the machine and manual adjustments shall be made to the total. Coins or tokens shall also cause manual adjustments to be made to the total. The total as recorded on the counting machine and any adjustments made thereto shall not be revealed to anyone until the final verification process is completed.

- d. Supervise a second Count team member, independent of the team member performing the initial Count by machine, who shall manually Count and summarize the currency and promotional coupons from each Drop Box or Slot Cash Storage Box counted in accordance with subparagraph (h) (5) (c) above. This total shall be posted and maintained separately from the total posted in section (h) (5) (c), and shall not be revealed to anyone until the final verification process is completed.
- e. Supervise the second Count team member's passing of the currency or promotional coupons to a Count team member, who shall be unaware of the results of the manual Count. The Count team member shall Count the contents of that Drop Box or Slot Cash Storage Box counted in subparagraph (h) (5) (c) above using a second counting machine. Such machine shall produce a printout of the total amount of currency or promotional coupons contained in the Drop Box. Any soiled or off-sorted bills or promotional coupons shall be re-fed into the machine and manual adjustments shall be made to the total. The total as recorded on the counting machine and any adjustments thereto shall not be revealed to anyone until the final verification process is completed.
- f. Following the completion of the test procedures, compare the totals from the test receipts of both counting machines, as computed in subparagraphs (h) (5) (c) and (h) (5) (e), to the manual total computed

in subparagraph (h) (5) (d). If the three totals compared above are in agreement, the Count Room Supervisor shall sign and date and record his or her gaming license number on the test receipts and forward them to the Accounting Department at the end of the Count process.

g. If the three totals do not agree, appropriate repairs shall be made to the counting machine and the procedures in subparagraphs (h) (5) (a) through (h) (5) (f) shall be repeated until all totals are in agreement. The SGA shall not permit the counting machine to be used until these totals are in agreement.

(6) Any promotional coupon deposited into a Drop Box or Slot Cash Storage Box shall be counted and included in the calculation of table game win or loss in accordance with paragraph (h) (8) below, without regard to the validity of the promotional coupon.

(7) Any promotional coupon which has not already been canceled upon acceptance or during the Count shall be canceled prior to the conclusion of the Count, in a manner approved in writing by the SGA.

(8) As the contents of each Drop Box or Slot Cash Storage Box are counted, a Count team member shall manually record or cause a computer system to record, in a manner approved in writing by the SGA, the following information on the Master Game Report or other supporting documentation by game and table number:

- a. The amount of each denomination of currency counted;
- b. The amount of all denominations of currency counted;
- c. The amount of coin and/or tokens counted;
- d. The total amount of currency and coin or tokens counted;
- e. The total amount of each denomination of promotional coupons other than match play promotional coupons;
- f. The total amount of all denominations of promotional coupons other than match play promotional coupons;
- g. The total amount of each denomination of match play promotional coupons;
- h. fifty (50) percent of the total amount of all denominations of match play promotional coupons;
- i. The amount recorded on each document evidencing a credit card Chip transaction;
- j. The total of the amounts recorded on all documents evidencing credit card Chip transactions;
- k. The amount recorded on each document evidencing a debit card Chip transaction;
- l. The total of the amounts recorded on all documents

evidencing debit card Chip transactions;

- m. The amount of the Opener;
 - n. The amount of the Closer;
 - o. The serial number and amount of each Counter Check;
 - p. The amount of all Counter Checks counted;
 - q. The serial number and amount of each Fill;
 - r. The amount of all Fills;
 - s. The serial number and amount of each Credit;
 - t. The amount of all Credits; and
 - u. The gaming date of the items being recorded and the date the Master Gaming Report is being prepared or generated.
- (9) After the contents of each Drop Box are counted and recorded, a member of the Count team shall manually record or cause the computer to record on the Master Game Report, by game, the total amount of currency, coin, promotional coupons, Table Inventory Slips, Counter Checks, Fills, and Credits Counted, and win or loss, together with such additional information as may be required on the Master Game Report by the SGA or the Nation Gaming Operation.
- (10) Notwithstanding the requirements of paragraphs (h) (8) and

(9) above, if the Nation Gaming Operation's approved System of Internal Controls provides for the recording on the Master Game Report or supporting documents of Fills, Credits, Counter Checks, documents that evidence credit card or debit card Chip transactions, and Table Inventory Slips by Cage Cashiers prior to commencement of the Count or includes a computerized system whereby all Fills, Credits, Counter Checks, documents that evidence credit card or debit card Chip transactions, and Table Inventory Slips are entered into the computer system at the time of preparation, a Count team member shall compare for agreement the totals of the amounts previously recorded or entered to the Fills, Credits, Counter Checks, the documents that evidence credit card or debit card Chip transactions, and Table Inventory slips that are removed from the Drop Boxes.

(11) The Slot Cash Storage Box Report shall be, at a minimum, a two-part form consisting of an original and a duplicate copy unless the Nation Gaming Operation chooses, pursuant to (1)3 below, to make copies of the original Slot Cash Storage Box, in which case only an original shall be required. Each additional copy of a multi-part Slot Cash Storage Box Report shall be clearly labeled as a copy. As the contents of each Slot Cash Storage Box are counted, a Count team member shall manually record or cause a computer system to record, in a manner approved in writing by the SGA, the following information on the Slot Cash Storage Box Report or supporting documentation:

(i) The asset number of the bill changer to which the Slot Cash Storage Box contents correspond or, if the Nation

Gaming Operation utilizes Slot Cash Storage Boxes with unique identification number, the number shall be recorded along with the asset number of the Gaming Device;

- (ii) The amount of each denomination of currency counted;
 - (iii) The amount of all denominations of currency counted;
 - (iv) The total amount of currency counted for each Gaming Device denomination;
 - (v) The total dollar amount of each denomination of coupon;
 - (vi) The total dollar value of all denominations of coupons;
 - (vii) The gaming date of the items being recorded and the total number of all Slot Cash Storage Boxes opened and counted.
- (12) Notwithstanding the requirements of paragraphs (h) (8) and (9) above, if the Nation Gaming Operation's approved System of Internal Controls provides for the Count team functions to be comprised only of counting and recording currency, coin and promotional coupons, Accounting Department employees shall perform all other counting, recording and comparing duties required by this section;
- (13) After preparation of the Master Game Report, the Count team members performing the banking functions and the Count Room

Supervisor shall sign and record his or her gaming license number on the reports attesting to the accuracy of the information recorded thereon. All other Count team members shall either sign and record his or her gaming license number on the Master Game Report or such other document as approved in writing by the SGA as evidence of their participation in the counting of the Drop Boxes. Any person who, in accordance with subdivision (f) above, is scheduled to leave the Count Room prior to the completion of the entire Count process, shall also record his or her gaming license number and the time that he or she exited the Count Room. Any person who enters or leaves the Count Room due to an emergency shall sign and record his or her gaming license number and record the time of the entry or exit on the Master Game Report or such other document as approved by the SGA, except that, if the person exiting the Count Room is unable to sign the document due to the nature of the emergency, the Count Room Supervisor shall record the person's name, gaming license number and time of exit and a notation describing the emergency on the document.

- (i) After the contents of all Drop Boxes have been counted:
 - (1) All Cash, tokens, and promotional coupons shall be presented in the Count Room by a Count team member to a Main Bank Cashier or Cage Supervisor who, prior to having access to the information recorded on the Master Game Report and in the presence of a Count team member and the SGA Inspector, shall recount, either manually or mechanically, the Cash and promotional coupons presented and attest by signature and gaming license number on the Master Game Report the amounts of Cash and promotional

coupons counted, after which the SGA Inspector shall sign the report evidencing his or her presence during the Count and the fact that both the cashier or Cage Supervisor and the Count team have agreed on the total amounts of Cash and promotional coupons Counted. The Nation Gaming Operation may, if approved in writing by the SGA, present the Main Bank cashier or Cage Supervisor with the Cash and promotional coupons obtained from the Count of the Drop Boxes either:

- a. At the same time, in which event the Cash, tokens, and promotional coupons shall be presented immediately after both Counts have been concluded; provided, however, that the Nation Gaming Operation shall set forth in its approved System of Internal Controls the procedures for segregating and securing the Cash and promotional coupons from the first Count that is concluded until presented to the Main Bank cashier or Cage Supervisor after the conclusion of the second Count; or
- b. Separately, in which event the Cash and promotional coupons from each Count shall be presented immediately after the conclusion of the Count; provided, however, that if the Cash and promotional coupons from the first Count that is concluded are presented while the second Count is in progress:
 1. There shall be no Cash, tokens, or promotional coupons in the Count Room removed from an opened box that has not already been counted at least once; and

2. All Count Room employees shall be required to step away from the Count table until the presentation is completed and the Cash and promotional coupons from the first Count are removed from the Count Room.
- (2) The Master Game Report, after signing, and the Requests for Fills, the Fills, the Requests for Credits, the Credits, the issuance copies of the Counter Checks, the Table Inventory Slips, the documents evidencing a credit or debit card Chip transaction and the promotional coupons removed from Drop Boxes shall be transported directly to the Accounting Department and shall not be available to any cashier's cage personnel. All promotional coupons shall be received and processed by the Accounting Department.
 - (3) If the Nation Gaming Operation's approved System of Internal Controls does not provide for the forwarding from the cashier's cage of the originals of the Fills, Credits, Requests for Credits, and the Requests for Fills, and the issuance copies of the Counter Checks, directly to the Accounting Department, the originals of all such slips recorded, or to be recorded, on the Master Game Report shall be transported from the Count Room directly to the Accounting Department by a Security Department Member.
- (j) In addition to the procedures for conducting the Count by the Count team set forth under paragraphs (h) (4) , (5) and (12) above, and the procedures for conducting the recount by a Main Bank cashier or Cage Supervisor set forth under paragraph (i) (1) above, in the event of a variance attributable to intermixed

denominations of Cash or promotional coupons, an adjustment shall be made to the Master Game Report reflecting the amount, type (Cash or promotional coupon) and source (identified to a Gaming Table) of such variance; however if the source of the variance is a Gaming Table and the Gaming Table to which the adjustment should be made can not be identified, the adjustment shall be deemed to be from the Drop Box of a predesignated blackjack table(s).

- (k) The originals and copies of the Master Game Report, Counter Checks, the documents that evidence credit or debit card Chip transactions, Requests for Fills, Fills, Requests for Credits, Credits, Table Inventory Slips and the test receipts from the currency counting equipment shall, On a Daily Basis, in the Accounting Department be:
 - (1) Compared for agreement with each other, on a test basis if the originals are received from the Count Room, by persons with no recording responsibilities and, if applicable, to triplicates or stored data;
 - (2) Reviewed for the appropriate number and propriety of signatures on a tests basis;
 - (3) Accounted for by series numbers, if applicable;
 - (4) Tested for proper calculation, summarization, and recording;
 - (5) Subsequently recorded; and
 - (6) Maintained and controlled by the Accounting Department as

a permanent accounting record.

- (1) The keno computer system shall have the capability of generating a report which lists, by keno work station, the Keno Drop, total amount won by patrons and Keno Win or loss for each gaming day. This report shall be audited by an Accounting Department employee. Once the audit procedures have been completed, the Accounting Department employee shall sign and record his or her gaming license number on the report and either attach the report to the Master Game Report for that gaming day or record the appropriate figures from that report onto the Master Game Report.

43. Transportation expense reimbursements

- (a) All transportation expense reimbursement transactions, except as otherwise provided in subdivision (h) below, shall be performed at the main cage.

- (b) Whenever a patron requests that the Nation Gaming Operation to reimburse them for transportation expenses, a Travel Disbursement Voucher (Voucher) shall be prepared. Vouchers shall be maintained in a secure location approved in writing by the SGA. Access to Vouchers, prior to use, shall be restricted to those individuals authorized by the System of Internal Controls to approve such disbursements. Prior to the transportation expense reimbursement, an individual authorized to approve the disbursement shall examine the original tickets, invoices or receipts presented by the patron in support of the request for valid transportation expense reimbursement. Such tickets, invoices or receipts shall:
 - (1) Contain the actual cost of transportation for which reimbursement is sought;
 - (2) Be dated within thirty (30) days of the request for reimbursement. However, reimbursements may be made for tickets, invoices or receipts which are dated more than thirty (30) days but no more than one hundred eighty (180) days prior to the date of request for reimbursement if a satisfactory explanation is included on the Voucher as to why presentation was delayed;
 - (3) Be in the name of the requesting patron, provided, however, that the tickets, invoices or receipts may be in the name

of a person accompanying said patron, or contain no name if the amount of reimbursement is two hundred fifty dollars (\$250.00) or less, provided a satisfactory explanation thereof is noted on the Voucher; and

- (4) State a destination and provide documentation evidencing that patron's presence at the Nation Gaming Operation during the trip in which the expenses were incurred.
- (c) vouchers shall be, at a minimum, a two-part form, approved in writing by the SGA.
- (d) Vouchers shall be manually prepared or computer generated and shall contain, at a minimum, the following information:
- (1) The date and time of preparation;
 - (2) The patron's name and address;
 - (3) A description of the transportation expense incurred;
 - (4) The amount approved for reimbursement, which amount shall not exceed the actual cost of transportation recorded on the ticket, invoice or receipt;
 - (5) The ticket, invoice or receipt number or an indication that such number is not available, the date of issuance and the name of the issuer of the ticket, invoice or receipt;
 - (6) The signature and gaming license number of the authorizer;
 - (7) The method of payment and, if payment is by check, the

check number;

- (8) An indication as to which of the following methods was used by the general cashier to verify the identity of the patron:
 - a. A comparison of the patron's signature on the Voucher and physical appearance with that contained on a governmentally issued identification credential that included a photograph or general physical description of the patron;
 - b. A personal attestation by the authorizer as to the identity of the patron; or
 - c. A comparison of the patron's signature on the Voucher and his or her physical appearance with the signature and general physical description recorded in a patron signature file;
- (9) The signature and gaming license number of the general cashier; and
- (10) The patron's signature, indicating acknowledgment of the following statement which shall be included on the Voucher: "I affirm that the expenses for which I am seeking reimbursement are supported by genuine tickets, invoices or receipts which I (have provided) (will provide) to the Nation Gaming Operation and I have not received reimbursement for these expenses from any other source. I am aware that this Voucher is required to be prepared by the SGA and that I may be subject to civil or criminal

liability if any material information provided by me is willfully false."

- (e) A list shall be maintained in the main cage of the names, titles and gaming license numbers of those individuals authorized to approve Vouchers. A copy of this list shall be submitted to the SGA as it is updated, or as otherwise required by the SGA.
- (f) After examination of the original tickets, invoices or receipts, the authorizer shall record the information noted in paragraphs (d) (1) through (d) (5) above, sign the Voucher and present the original and duplicate copy of the Voucher as well as the original tickets, invoices or receipts and any other additional documentation provided in accordance with paragraph (b) (4) above to the general cashier.
- (g) The general cashier shall:
 - (1) Verify the requesting patron's identity in accordance with paragraph (d) (8) above and record such method of verification on the Voucher;
 - (2) Cancel the original tickets, invoices or receipts in such a manner to prevent subsequent reimbursement and obtain a copy of the original tickets, invoices or receipts, including such cancellation marking, and a copy of any other additional documentation provided in accordance with paragraph (b) (4) above;
 - (3) Sign and record his or her gaming license number on the Voucher;

- (4) Obtain the patron's signature on the original copy of the Voucher;
 - (5) Record the method of payment in accordance with paragraph (d) (7) above on the Voucher and return the canceled original tickets, invoices or receipts, and any other additional documentation provided in accordance with paragraph (b) (4) above, and corresponding reimbursement funds by Cash or check to the patron;
 - (6) Attach the copy of the original tickets, invoices or receipts, canceled in accordance with paragraph (g) (2) above, and a copy of any other additional documentation provided in accordance with paragraph (b) (4) above, to the original Voucher;
 - (7) Place the duplicate copy of the Voucher in a locked Accounting Department box to be picked up On a Daily Basis by Accounting Department personnel with no incompatible functions; and
 - (8) Retain the original Voucher with the attached documentation for closeout purposes and subsequent forwarding, On a Daily Basis, to the Accounting Department for matching and agreement with the duplicate.
- (h) If a transportation expense reimbursement transaction cannot be completed at the main cage due to the unavailability of required information or documentation, the Nation Gaming Operation may perform a transportation expense reimbursement transaction by mail by complying with the requirements of subdivisions (a) through (g) above except as otherwise modified below:

- (1) The authorizer shall record the date of request for reimbursement and the information noted in paragraph (d) (2) above on the Voucher, and present the partially completed Voucher to the general cashier.
- (2) The general cashier shall obtain the patron's signature on the Voucher, verify the requesting patron's identity in accordance with paragraph (d) (8) above, stamp the term "mail in" on the Voucher and sign and record his or her gaming license number on the Voucher. Any partially completed Voucher shall be maintained by the Nation Gaming Operation in an approved secure location within the main cage, and shall be processed as soon as all required information or documentation is available.
- (3) The authorizer, upon receipt of all information and documentation required to complete the Voucher in accordance with subdivision (d) above, shall obtain the partially completed Voucher from the general cashier, and shall:
 - a. Record the information noted in paragraphs (d) (1) and (d) (3) through (d) (5) above;
 - b. Sign and record his or her gaming license number on the Voucher; and
 - c. Present the original and duplicate Voucher, and original ticket, invoice, receipt or other documents to the general cashier.

- (4) The general cashier shall complete the Voucher in accordance with subdivision (g) above and sign and record their gaming license number on the Voucher; provided, however, that the general cashier shall attach the canceled ticket, invoice, receipt or any other additional documentation provided in accordance with paragraph (b) (4) above, to the original Voucher, and shall return such documentation to the patron upon request; and the general cashier shall mail the corresponding reimbursement check to the requesting patron.

- (5) Any partially completed Voucher which is not completed within sixty (60) days from the date of request for reimbursement shall be voided in accordance with subdivision (c) above.

44. Acceptance, accounting and distribution of tips or gratuities from patrons

- (a) No Nation Gaming Operation management employee, Boxperson, floorperson, or any other Gaming Facility employee who serves in a Supervisory position shall solicit or accept, and no other Nation Gaming Operation employee shall solicit, any tip or gratuity from any player or patron of the Gaming Facility where he or she is employed.
- (b) All tips and gratuities received by Dealers in the Gaming Facility shall be:
 - (1) Immediately deposited in a transparent locked box attached to the Gaming Table reserved for that purpose. If Non-Value Chips are received as tips or gratuities at a roulette table, the Marker button indicating their specific value shall not be removed until after a Dealer, in the presence of a Nation Gaming Operation Supervisor, has expeditiously converted them into Value Chips, which shall then be immediately deposited into the transparent locked box reserved for that purpose;
 - (2) Accounted for by a team of Dealers known as the tip (or token) committee who shall be elected among all Dealers; and
 - (3) Placed in a common pool for complete distribution pro rata among all Dealers, with the distribution based upon the number of hours each Dealer has worked.
- (c) Upon receipt from a patron of a tip or gratuity, a Dealer shall extend his or her arm in an overt motion, and deposit such tip

or gratuity in the locked box reserved for such purpose in paragraph (b) (1), above.

- (d) In determining the number of hours which an employee has worked for purposes of tip pool distribution, a Nation Gaming Operation may, upon written approval of the SGA, establish standards for distribution which include hours of vacation time, personal leave time or any other authorized leave of absence in the number of hours worked by each employee. Any such standards shall apply uniformly to all employees, except that the Nation Gaming Operation may establish different standards for full-time and part-time employees.
- (e) Any distribution of tips and gratuities from a common tip pool pursuant to this section shall occur no more frequently than once every fourteen (14) calendar days.
- (f) Calculation and distribution of tips or gratuities are subject to audit by the SGA.

45. Payment of table game progressive Wagers

- (a) Whenever a patron wins a table game progressive Payout, the Nation Gaming Operation shall either:
 - (1) Pay the Wager from the gaming Chips in the table inventory container;
 - (2) Issue a receipt to the patron which may be exchanged for payment at the cashier's cage; or
 - (3) Have a Security Department Member bring the payment to the patron at the table from the cashier's cage.

- (b) If the Nation Gaming Operation elects to pay the Wager pursuant to either paragraphs (a) (2) or (a) (3) above, the Nation Gaming Operation shall submit to the SGA for review and written approval, a System of Internal Controls procedures governing the payment to the patron. At a minimum, the procedures shall provide for the following:
 - (1) Documentation prepared by a floorperson or Supervisor which records the configuration of the winning hand and the amount of the payment, with a copy deposited into the Drop Box attached to the table and a copy given to the patron;
 - (2) A multi-part form which is prepared by the general cashier or Cage Supervisor which documents the issuance of the payment to the patron or a security department representative for transportation to the patron;
 - (3) Accounting Department procedures for verifying the payment

of the table game progressive payment, which shall include verifying the meter readings; and

- (4) Procedures for the adjustment of the Master Game Report and the proper reporting of the table game win/loss.

- (c) All forms used for the payment of table game progressive Payouts shall be serially prenumbered forms, each series of which shall be used in sequential order, with the series of numbers of all forms received by the Nation Gaming Operation being accounted for by employees independent of the cashier's cage and the gaming facilities department. All voided forms shall be marked "VOID" and shall require the signature and gaming license number of the preparer.

- (d) All forms used for the payment of table game progressive Payouts shall be clearly identified as forms used for such purpose.

- (e) All table game progressive payments shall be made in the presence of a Gaming Facility Supervisor.

- (f) Prior to the payment of a table game progressive Payout, a Gaming Facility Supervisor shall record the amount of such payment on the progressive meter in a manner as approved in writing by the SGA.

46. Slot booths

(a) Each establishment may have on or immediately adjacent to the gaming floor one or more physical structures, each to be known as a slot booth, to house one or more slot cashiers and to serve as the central location in the Nation Gaming Operation or, when there are multiple slot booths, in that portion of the Nation Gaming Operation, for the following:

1. The custody of the slot booth inventory comprising currency, coin, slot tokens, forms, documents, and records normally associated with the operation of a slot booth;
2. The exchange by patrons of coin for currency or slot tokens;
3. The exchange by patrons of currency for currency, coin or slot tokens;
4. The exchange by patrons of gaming Chips, prize tokens or slot tokens for currency, slot tokens or coin;
5. The exchange by patrons of coupons for currency, coin or slot tokens in conformity with the procedures approved in writing by the SGA.
6. The exchange by patrons of signed Slot Counter Checks for currency, coin or slot tokens, or any combination thereof, in conformity with the procedures approved in writing by the SGA.
7. The issuance of Hopper Fills in conformity with the

procedures approved in writing by the SGA.

8. The issuance of Payouts in conformity with; the procedures approved in writing by the SGA; and
9. The issuance of coin or slot tokens to automated coupon redemption machines in exchange for proper documentation; and
10. The issuance of Cash or slot tokens to patrons upon the presentation of a recognized credit or debit card in accordance with the procedures approved in writing by the SGA;
11. The issuance, receipt and reconciliation of imprest funds used by slot attendants and changepersons in conformity with the functions set forth herein and upon the preparation of appropriate documentation in accordance with procedures approved in writing by the SGA;
12. The receipt of currency and coupons from slot attendants in an even exchange for currency;
13. The receipt of coin, currency, coupons, slot tokens, prize tokens or gaming Chips from changepersons in an even exchange for coin, currency or slot tokens;
14. The exchange of currency for coin and slot tokens, currency for currency, or coin and slot tokens for currency between slot cashiers upon the preparation of appropriate documentation and in accordance with procedures approved in writing by the SGA; and

15. The exchange with the master coin bank of coin, currency, slot tokens, prize tokens, gaming Chips, gaming plaques, coupons, issuance copies of Slot Counter Checks and documentation upon the preparation of a Slot Booth Exchange Slip.
- (b) Except for the transactions authorized by (a) above, a slot booth shall not obtain coin, currency, prize tokens or slot tokens, through exchange or otherwise, from any source other than the master coin bank or a coin vault approved by the SGA. An exchange with the master coin bank or coin vault must be accompanied by a Slot Booth Exchange Slip or by a Fill Slip authorizing the distribution of coins, prize tokens or slot tokens to the slot booth. A Slot Booth Exchange Slip shall be a two-part, serially prenumbered form signed by the master coin bank cashier, slot cashier, and each person transporting the funds.
- (c) Each slot booth shall be designed and constructed to provide at all times maximum security for the materials housed therein and for the activities performed therein. At a minimum, each slot cashier window shall be equipped with an electrical system, approved by the SGA, which enables a slot cashier or other authorized person in the booth to transmit a signal that is audibly and visually reproduced in each of the following locations whenever an emergency exists:
1. The monitoring rooms required by the SGA; and
 2. The Nation Gaming Operation security department of the Nation Gaming Operation.

47. Accounting controls for slot booths and change machines

- (a) The assets for which the slot cashiers are responsible shall be supplied from the Main Bank or master coin bank. Each slot cashier shall operate with an individual imprest inventory. At the end of each Shift, the slot cashier assigned to the outgoing Shift shall record on a Slot cashiers' Count Sheet the face value of each slot booth inventory item counted and the total opening and closing slot booth inventories and shall reconcile the total closing inventory with the total opening inventory.
- (b) Signatures attesting to the accuracy of the information contained on the slot cashiers' Count sheet shall be, at a minimum, of the following cashiers after preparation of the slot cashiers' Count sheet:
 - (1) The cashier assigned to the outgoing Shift; and
 - (2) The cashier assigned to the incoming Shift.
- (c) At the end of each gaming day, at a minimum, a copy of the slot cashiers' Count Sheets for the previous gaming day shall be forwarded to the Accounting Department for agreement of opening and closing inventories, agreement of amount thereon to other records and documents required by this regulation, and recording of transactions.
- (d) The slot booth inventory may be used to supply changepersons with an imprest inventory of coin, currency and slot tokens, provided that such inventory shall only be used to accept any combination of currency, coin, gaming Chips, slot tokens, prize tokens or coupons presented by a patron in exchange for an

equivalent amount of any combination of currency, coin or slot tokens. The slot booth inventory may also be used to provide a changeperson with coin, currency and slot tokens in exchange for an equal amount of any combination of coin, currency, coupons, prize tokens or gaming Chips. The exchange of coupons shall be in accordance with the procedures approved in writing by the SGA. If a changeperson's inventory is obtain from a location other than a slot booth, the location and the procedures for the issuance and maintenance of the inventory shall be approved in writing by the SGA.

- (e) The slot booth inventory may be used to supply automated coupon redemption machines with an imprest inventory of coin or slot tokens.
- (f) Change machines shall be governed by the accounting and internal control procedures required by this section, which shall be submitted to the SGA for review and approval.
- (g) The slot booth inventory may be used to supply slot attendants with an imprest inventory of currency to be used in the exchange of currency and coupons presented by a patron.

48. Gaming Devices and bill changers; coin and slot token containers; Slot Cash Storage Boxes; entry authorization logs

- (a) Each Gaming Device located in a Nation Gaming Operation shall have the following coin, prize token or slot token containers:
1. At least one but no more than two containers, each to be known as a Payout reserve container ("hopper"), in which coins, prize tokens or slot tokens are retained by the Gaming Device to automatically pay Jackpots or to dispense change as directed by a bill changer connected to the Gaming Device.
 2. A container, known as a slot drop bucket or slot Drop Box, to collect coins or slot tokens that are retained by the Gaming Device and are not used to make change or automatic Jackpot Payouts. Each slot drop bucket or slot Drop Box shall be identified by a number which corresponds to the asset number of the Gaming Device, and which is permanently imprinted on or affixed to the outside of the slot drop bucket or slot Drop Box in numerals. The number must be conspicuous and clearly visible to persons involved in removing or replacing the slot drop bucket or slot Drop Box in the Gaming Device and through the Nation Gaming Operation's closed circuit camera coverage system. The size and location of the number are subject to prior approval by the SGA. In addition to bearing an asset number, each slot drop bucket or slot Drop Box may also be identified by a bar code label that is securely affixed thereto.
 3. On those Gaming Devices which include a bill changer, a

container known as a Slot Cash Storage Box, in which currency and coupons accepted by the bill changer are retained. The Slot Cash Storage Box shall be accessible only by a dedicated bill changer drop door.

- (b) A slot drop bucket shall be housed in a locked compartment separate from any other compartment of the Gaming Device. The compartment shall have two locks, the keys to which shall be different from each other and from the keys utilized to secure all other compartments of the Gaming Device. Keys are to be maintained in accordance with procedures approved in writing by the SGA.

- (c) A slot Drop Box shall have:
 - 1. A slotted opening through which coins and slot tokens can be deposited;
 - 2. A device that will automatically close and lock the slotted opening upon removal of the slot Drop Box from the Gaming Device; and
 - 3. Two separate locks securing the contents of the slot Drop Box, the keys to which shall be different from each other. The keys are to be maintained in accordance with the procedures approved in writing by the SGA.

- (d) A slot Drop Box shall be housed in a locked compartment separate from any other compartment of the Gaming Device. The area in which the slot Drop Box is located shall be secured by two separate locks, the design, location and operation of which shall be approved by the SGA, and the keys to which shall be

different from each other. The keys are to be maintained in accordance with the procedures approved in writing by the SGA.

- (e) Keys to each Gaming Device, or any device connected thereto which may affect the operation of the Gaming Device, with the exception of the keys to the compartments housing the slot drop bucket and to the locks securing the areas where the Slot Cash Storage Box and slot Drop Box are located, shall be maintained in a secure place and controlled by the slot department.
- (f) Any key removed from a department's secure area pursuant to the above procedures, shall be returned no later than the end of the Shift of the department member to whom the key was issued, and the department shall establish a sign-out and sign-in procedure approved in writing by the SGA for all such keys removed.
- (g) Unless a computer which automatically records the information specified in 1, 2, and 3 below is connected to the Gaming Devices in the Nation Gaming Operation, the following entry authorization logs shall be maintained by the Nation Gaming Operation:
 - 1. Machine entry authorization log shall be used to record at a minimum the date, time, purpose of opening the machine or device, and the signature and gaming license number of the authorized employee opening the machine or device. The Machine Entry Authorization Log shall be maintained in the Gaming Device and shall have recorded thereon a sequential number and a manufacturer's serial number or the asset number of that Gaming Device.
 - 2. Whenever it is required that a Progressive Controller not

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49. Gaming Devices and bill changers; authorized locations; movements

- (a) Each Gaming Device that is on a Nation Gaming Operation floor shall be:
 - 1. Placed at an authorized location identified on a Nation Gaming Operation floor plan approved in writing by the SGA; and
 - 2. Identified on a Gaming Device Master List required by the SGA.
- (b) No Gaming Device or bill changer shall be removed from or returned to an authorized Gaming Device location in the Nation Gaming Operation or moved from one authorized Gaming Device location to another except in accordance with the requirements of the procedures approved in writing by the SGA.

50. Jackpot Payouts of Cash or slot tokens that are not paid directly from the Gaming Device

- (a) Whenever a patron wins a Jackpot of coins or slot tokens that is not totally and automatically paid directly from the Gaming Device, a Request for Jackpot Payout Slip ("Request") shall be prepared after the preparer observes the combinations on the Gaming Device and determines the appropriate amount of the Payout, based on the winning combinations. If the manual Jackpot is less than \$10,000, the preparer of the Request shall be a slot attendant or a slot attendant Supervisor. If the manual Jackpot is \$10,000 or more, the preparer of the Request shall be a slot attendant Supervisor. The Request shall be, at a minimum, a one-part form or the information required on it maintained in stored data, access to which, prior to use or input, shall be restricted to slot attendants and slot attendant Supervisors.
- (b) The information to be contained on a Request form shall be approved in writing by the SGA.
- (c) Following preparation, the Request shall be immediately transported by the preparer or the information maintained in stored data shall be available to a slot booth, the master coin bank or the cashier's cage where it will serve to authorize the preparation of a Jackpot Payout Slip ("Payout") by a slot cashier, master coin bank cashier or general cashier in accordance with the procedures approved in writing by the SGA.
- (d) Payouts shall be serially prenumbered forms, each series of which shall be used in sequential order, and the series of numbers of all Payouts received by a Nation Gaming Operation

shall be accounted for by employees independent of the cashier's cage and the slot department. All original and duplicate void Payouts shall be marked "VOID:" and shall require the signature and gaming license number of the preparer.

Notwithstanding the above, a serially prenumbered combined Jackpot Payout hopper fill form may be utilized as approved in writing by the SGA, provided that the combined form shall be used in a manner which otherwise complies with the procedures and requirements established by this section.

- (e) Nothing in this section shall preclude the payment of Jackpots in the form of annuity over a period of time not to exceed twenty-five years. Nor shall this section preclude the Nation Gaming Operation from participating in Progressive Jackpots inter-linked to other licensed gaming operations in accordance with procedures approved in writing by the SGA.

51. Inspection of Gaming Device Jackpots

- (a) Prior to the payment of any Gaming Device Jackpot of \$50,000 or more, any Jackpot of merchandise or a thing of value with a Cash Equivalent value of \$50,000 or more, or any Jackpot where there is evidence of a malfunction, the Nation Gaming Operation shall notify the SGA that a winning combination has been registered and permit the SGA to inspect any Gaming Device, progressive equipment or related equipment involved.
 - 1. Upon notification by the Nation Gaming Operation, the SGA shall advise the Nation Gaming Operation whether the SGA will conduct an inspection. When an inspection is conducted, the Nation Gaming Operation may award payment of the Jackpot to the winning patron upon completion of the inspection, absent a contrary direction from the SGA.
 - 2. Failure of the SGA to object to the payment of the Jackpot upon completion of its inspection shall not constitute waiver or estoppel of any charge, issue or claim raised in any criminal or regulatory complaint subsequently filed against any person in connection with the winning or payment of that Jackpot.
- (b) Nothing in (a) above shall be deemed to limit the obligation the Nation Gaming Operation to cooperate with the SGA in any inquiry or investigation concerning Gaming Device Jackpots.

52. Procedure for filling Payout reserve containers of Gaming Devices and hopper storage areas ("Hopper Fills")

- (a) Each hopper of a Gaming Device may be filled by a slot attendant, slot mechanic or slot Supervisor by requesting coin, slot tokens or prize tokens that are compatible with the hopper to be filled from a slot cashier, general cashier or master coin bank cashier or by obtaining coin, slot tokens or prize tokens that are compatible with the hopper to be filled from its corresponding hopper storage area.
- (b) The filling of a hopper or a hopper storage area with coin, slot tokens or prize tokens obtained from a slot cashier, general cashier or master coin bank cashier shall be accomplished in accordance with the procedures approved in writing by the SGA.

53. Removal of slot drop buckets, slot Drop Boxes and Slot Cash Storage Boxes; unsecured currency; meter readings

- (a) For each Gaming Device and attached bill changer on the gaming floor, the slot drop bucket, slot Drop Box and Slot Cash Storage Box shall be removed, in a method as approved in writing by the SGA, at least once a week on specified days and at times designated by the Nation Gaming Operation on a schedule which shall be filed with the SGA, with a copy to the SGO. No slot drop bucket, slot Drop Box or Slot Cash Storage Box shall be emptied or removed from its compartment at other than the times specified on such schedule except with the express approval of the SGA. Prior to emptying or removing any slot drop bucket, slot Drop Box or Slot Cash Storage Box, the Nation Gaming Operation shall notify the SGA and the Surveillance Department of the transportation route that will be utilized.

- (b) Nothing in this section shall be deemed to require the removal of slot drop buckets, slot Drop Boxes and Slot Cash Storage Boxes from all Gaming Devices from the gaming floor on the same day.

54. Procedure for counting and recording contents of slot drop buckets and slot Drop Boxes

- (a) The opening, counting and recording of the contents of slot drop buckets and slot Drop Boxes (the "hard Count") shall be performed in the Count Room by at least three employees (the "Count team"), which may include the Count Room Supervisor. All members of the Count team present in the Count Room during the counting process shall be required to wear a full-length, one-piece, pocketless outer garment with no openings other than for the hands, feet and neck. The hard Count shall be performed in the presence of a SGA representative in accordance with the procedures approved by the SGA in writing.

- (b) Except as otherwise approved by the SGA in writing, the contents of slot drop buckets and slot Drop Boxes shall be counted and recorded immediately after removal from their Gaming Device compartments.

55. Keno Public Areas

- (a) In addition to conducting keno operations on the gaming floor, the Nation Gaming Operation may conduct keno operations in other Public Areas of the Gaming Facility (keno Public Areas) in accordance with the provisions of this section. Keno Public Areas shall be approved in writing by the SGA and may include, without limitation, restaurants, lounges and bars, but shall not include hotel rooms used for the lodging of guests.
- (b) Keno tickets shall only be issued and redeemed in keno Public Areas by a keno writer or keno runner.
- (c) Prior to commencement of keno operations in a keno Public Areas, the Nation Gaming Operation shall request and obtain written approval of the SGA. Such request shall, at a minimum, describe:
 - (1) The Public Areas where keno tickets shall be sold and redeemed;
 - (2) The method or methods that shall be used to sell and redeem keno tickets; and
 - (3) If keno runners shall be used, the location of the keno work stations from which the keno runners shall purchase and redeem keno tickets, and the routes that they shall use to get to and from such keno work stations in the keno Public Areas or to and from the perimeter of the gaming floor.

56. Keno computer system

- (a) The Nation Gaming Operation shall obtain written approval of the SGA for its System of Internal Controls governing the security and control of its keno computer system. Such internal controls shall, without limitation, include:
 - (1) System access restrictions which shall, at a minimum, preclude multiple log-ons by the same individual;
 - (2) Hardware and software controls;
 - (3) Floppy disc controls;
 - (4) Override policies and restrictions;
 - (5) Adequate documentation of keno tickets and payoff information; and
 - (6) Backup and recovery procedures.
- (b) The keno computer system shall have the capability of generating a hard (paper) copy of each keno transaction. Each keno transaction shall be identified with a unique identification number for the gaming license holder who performed said transaction. The identification number for each gaming license holder shall be different than that gaming license holder's computer password code.
- (c) At any time, representatives of the SGA may Count or require the Count of the contents of a selected keno drawer and compare that Count to the computer-generated reports.

57. Keno runners

- (a) The Nation Gaming Operation may employ one or more "keno runners" to assist in the conduct of keno. A keno runner, who must be certified and licensed in accordance with the Compact, may act as an intermediary between a patron and a keno writer in order to facilitate the placement or redemption of a keno Wager. A keno runner may also accept and redeem keno Wagers at a keno booth, satellite keno booth or keno locker without the assistance of a keno writer, provided that:
 - (1) The keno runner operates out of his or her own keno drawer; and
 - (2) The Nation Gaming Operation's approved keno system can generate the reports necessary for the accounting and reconciliation of the assets and documents contained in the keno drawer of each keno runner.

- (b) A keno runner may, in accordance with the System of Internal Controls approved in writing by the SGA, carry an imprest fund of currency for the purpose of giving change to patrons who make keno Wagers. Such funds may be issued from either the keno vault or the Main Bank, but shall not be issued by a keno writer.

- (c) If a patron wishes to use a keno runner to place a keno Wager, the keno runner shall:
 - (1) Require the patron to complete a two-part keno runner request and to present currency, coin, gaming Chips and/or promotional coupons in an amount sufficient to fund the

request;

- (2) Provide a part of the keno runner request to the patron that will identify the patron to the keno Wager;
 - (3) Take the part of the keno runner request with the information regarding the Wager together with the currency, coin, gaming Chips and/or promotional coupons to a keno writer at a keno work station, a keno booth, a satellite keno booth or a keno locker where the keno runner has a keno drawer;
 - (4) Receive the keno ticket or tickets and any change from the keno writer, or generate them directly at his or her work station in a keno booth, satellite keno booth or keno locker; and
 - (5) Deliver the keno ticket or tickets to the patron in exchange for the identifying part of the keno runner request, provided that, prior to the exchange, the keno runner shall compare the two parts of the keno runner request to ensure that the ticket is being delivered to the correct patron.
- (d) If a patron wishes to use a keno runner to redeem a winning keno ticket, a keno runner shall:
- (1) Agree to assist the patron only if the winning keno ticket has a value that does not exceed five hundred dollars (\$500.00);
 - (2) Accept the ticket from the patron in exchange for a one-

part keno ticket receipt;

- (3) Take the winning ticket to a keno writer at a keno work station or to a work station in a keno booth, satellite keno booth or keno locker where the keno runner has a keno drawer; and
 - (4) Receive the proceeds of the ticket from the keno writer or take them from the keno runner's drawer in the keno booth, satellite keno booth or keno locker and deliver them to the patron in exchange for the keno ticket receipt.
- (e) Each keno runner shall, in accordance with the Nation Gaming Operation's approved System of Internal Controls, "sign in" prior to the start of each keno game for which the keno runner was authorized to accept keno Wagers. This act shall constitute a representation by the keno runner that all Wagers accepted for that game have been placed and that corresponding keno tickets have been issued, or that no Wagers were accepted for that game. After "signing in," a keno runner shall not accept additional Wagers for the game, but may deliver keno tickets to patrons for Wagers that were placed prior to the keno runner "signing in."
- (f) No keno game for which a keno runner has been authorized to accept Wagers shall close until all keno runners assigned to that game have "signed in" in accordance with subdivision (e) above.

58. Keno booths; satellite keno booths; keno lockers; roving keno work stations

- (a) Keno gaming operations shall only be conducted in a separate and distinct area approved in writing by the SGA, although the Nation Gaming Operation may conduct the same keno game or different keno games in areas approved in writing by the SGA. Any area designated for keno gaming activity shall be located:
 - (1) On the gaming floor; or
 - (2) In a public keno area, as that term is defined within this Appendix.
- (b) Any area designated for keno may contain a physical structure known as a keno booth to house the keno writers and to serve as the central location for the following:
 - (1) The custody of the keno booth inventory, including currency, coin, promotional coupons, gaming Chips and forms and documents normally associated with the operation of a keno booth;
 - (2) The exchange by patrons of promotional coupons for currency, coin for keno tickets;
 - (3) The receipt of currency, coin, gaming Chips and promotional coupons for Wagering at the game of keno;
 - (4) The payment of winning Wagers at the game of keno; and
 - (5) Such other functions normally associated with the operation

of a keno booth.

(c) The keno booth shall be designed and constructed to provide maximum security for the materials housed therein and the activities performed therein, and shall include the following:

(1) Separate work stations which shall include:

- a. Manually triggered silent alarm systems connected directly to the Surveillance Room of the closed circuit television system, the security department office, and the SGA;
- b. A computer terminal which shall be used to issue keno tickets and calculate Payouts for winning keno tickets; and
- c. An area for the storage of a keno drawer.

(2) A segregated area for the storage of the keno computer equipment. The location and security of the keno computer equipment shall be approved in writing by the SGA. Nothing herein shall preclude the Nation Gaming Operation from storing its keno computer equipment in another segregated and secure area of the Gaming Facility, provided that the location of, and the security measures for, such area have been approved in writing by the SGA.

(ci) In addition to the requirements in subdivision (c) above, a keno booth may contain the following:

(1) A segregated and secure area for the storage of locked keno

drawers; and

- (2) A segregated and secure area, maintained on an Imprest Basis by the keno Supervisor, which may be used to establish opening keno inventories and complete Keno Fills and Keno Credits pursuant to the requirements of the Compact and its Appendices.
- (e) The Nation Gaming Operation shall submit for review and written approval of the SGA, internal control procedures governing how this area will be maintained on an Imprest Basis. In addition, each keno Supervisor shall prepare a Count sheet to record the opening and closing balance for their Shift, which shall be signed by both the incoming and outgoing keno Supervisor, both of whom shall include their gaming license number.
 - (f) If a keno booth is designed so as to be immediately adjacent to the cashier's cage or a satellite cage and access to the keno booth is through the cashier's cage or satellite cage, the security department escort otherwise required for the transportation of keno drawers and Keno Fills and Credits shall not be required.
 - (g) The Nation Gaming Operation may, in its discretion, operate one or more satellite keno booths. All the provisions of this section governing the operation of a keno booth shall apply to a satellite keno booth, with the exception of the following:
 - (1) The keno games for which Wagers are accepted at a satellite keno booth must be the same keno games for which Wagers are accepted at the keno booth;

- (2) The only keno computer equipment which may be located at a satellite keno booth shall be the computer terminals used by the keno writers to issue keno tickets and calculate Payouts of winning keno tickets;
 - (3) A satellite keno booth may not contain a separate area for the storage of currency and coin pursuant to subdivision (d) above; and
 - (4) A satellite keno booth may operate without the presence of a keno Supervisor, however, a keno writer at a satellite keno booth may not redeem a winning keno ticket for one thousand five hundred dollars (\$1,500.00) or more unless a keno Supervisor is present.
- (h) The Nation Gaming Operation may, in its discretion, permit a keno runner to generate and redeem keno tickets from a keno locker located on the gaming floor. Each keno locker shall be a fully enclosed structure and shall contain one keno work station. A keno locker shall be closed and locked whenever it is unattended by a keno runner. A keno work station in a keno locker shall include:
- (1) A manually triggered silent alarm system connected directly to the Surveillance Rooms of the closed circuit television system, the security department office and the SGA;
 - (2) A computer terminal which shall be used to issue keno tickets and calculate Payouts for winning keno tickets;
 - (3) An area for the storage of one or more keno drawers, which area shall only be used by a keno runner selling or

redeeming keno tickets from that keno locker; and

- (4) A light that is located above the work station and is visible from outside the keno locker, which light shall automatically illuminate whenever the door to the keno locker is open.
- (i) The Nation Gaming Operation may, in its discretion, operate roving keno work stations which contain a keno terminal and a keno drawer. The roving keno work station shall be:
 - (1) Operated by a keno writer; and
 - (2) Operated on the gaming floor or in an approved public keno area, provided, however, that if a roving keno work station shall be operated in a public keno area, the keno writer shall receive and return his or her imprest funds, and perform all Fills and Credits in a restricted area approved in writing by the SGA for such activity.

59. Keno drawer fill procedures

- (a) Once a keno drawer has been opened for use by the keno writer or keno runner, if the keno writer or keno runner needs additional currency or coin the keno writer or keno runner shall prepare a Keno Fill Slip.
- (b) Keno fill slips shall be serially prenumbered forms. The series numbers of all Keno Fill Slips shall be unique to the game of keno, and each series of Keno Fill Slips shall be used in sequential order. All original and duplicate void Keno Fill Slips shall be marked "VOID" and shall require the signature and gaming license number of the keno writer or keno runner who prepared the slip.
- (c) A Keno Fill Slip shall be at least a two-part manual or computerized form and shall contain, at a minimum, the following information on the original and each copy of the slip:
 - (1) The denomination of the currency and coin being requested;
 - (2) The total amount of each denomination of currency and coin being requested;
 - (3) The total amount of all denominations of currency and coin being requested;
 - (4) The keno work station Location Number to which the currency and coin will be distributed;
 - (5) The date, time and Shift of preparation; and

- (6) The signature and gaming license number of the keno writer or keno runner or, if computer-prepared, the identification code and gaming license number of the keno writer or keno runner.
- (d) Upon completion of the Keno Fill Slip by the keno writer, a keno Supervisor shall either prepare the requested fill from the excess currency and coin maintained in the keno booth, or transport all copies of the Keno Fill Slip to the Main Bank where a cashier shall prepare the requested fill. Nothing herein shall preclude a Main Bank or Cage Supervisor from picking up the completed Keno Fill Slip at the keno booth.
- (e) Once the requested funds have been prepared for transfer, either the keno Supervisor or the Main Bank, as applicable, shall sign all copies of the Keno Fill Slip and retain a copy as a balancing item. The funds shall be transported to the keno writer or keno runner by the keno Supervisor, or by a Main Bank or Cage Supervisor, along with the original Keno Fill Slip. If the funds have been prepared by a Main Bank, the individual who will transport the funds shall sign and list their gaming license number for receipt of the funds, and a member of the security department shall escort the funds. If the funds need to be transported outside of the keno booth they shall be placed in a locked container, the key to which shall not be accessible to the security department, or in another receptacle approved, in writing, by the SGA.
- (f) Once the funds have been transferred to the keno writer or keno runner, the security department employee providing the escort shall sign and list his or her gaming license number on the original Keno Fill Slip, as evidence of the transportation of

the funds. The keno writer or keno runner shall then count the currency and coin and, if the amount is consistent with the amount recorded on the Keno Fill Slip, sign and list their gaming license number on the original Keno Fill Slip, and enter the amount of the fill into the computer terminal. Notwithstanding the foregoing, the keno Supervisor may input the amount of the fill into the computer terminal, provided the keno writer or keno runner verifies the amount input by the keno Supervisor, to the amount recorded on the original Keno Fill Slip.

- (g) Upon compliance with the signature requirements described in subdivision (f) above, the original Keno Fill Slip shall be maintained in the keno drawer, for subsequent reconciliation purposes.

60. Keno drawer credit procedures

- (a) Prior to the end of each keno writer's or keno runner's Shift or at such other times as may be necessary, the keno writer or keno runner may initiate the transfer of excess currency, coin, gaming Chips and promotional coupons to either the Main Bank or keno Supervisor by preparing a Keno Credit Slip.
- (b) Keno Credit Slips shall be serially prenumbered forms. The series numbers of all Keno Credit Slips shall be unique to the game of keno, and each series of Keno Credit Slips shall be used in sequential order. All original and duplicate void Keno Credit Slips shall be marked "VOID" and shall require the signature and gaming license number of the keno writer or keno runner who prepared the slip.
- (c) A Keno Credit Slip shall be at least a two-part manual or computerized form and shall contain, at a minimum, the following information on the original and duplicate of the slip:
 - (1) The denomination of the currency, coin and gaming Chips being exchanged;
 - (2) The total amount of each denomination of currency, coin and gaming Chips being exchanged;
 - (3) The total amount of promotional coupons being exchanged;
 - (4) The total amount of currency, coin, gaming Chips and promotional coupons being exchanged;
 - (5) The keno work station Location Number;

- (6) The date, time and Shift of preparation; and
 - (7) The signature and gaming license number of the keno writer or keno runner or, if computer prepared, the identification code and gaming license number of the keno writer or keno runner.
- (d) Upon completion of the Keno Credit Slip by the keno writer or keno runner, a keno Supervisor, Main Bank cashier or Cage Supervisor shall verify the items being removed from the keno drawer and the information recorded on the Keno Credit Slip. If the items to be removed and the recorded information agree, the keno Supervisor, Main Bank cashier or Cage Supervisor shall sign the original and duplicate Keno Credit Slip and place the items into a secured envelope or container for transportation to the Main Bank or designated area of the keno booth. The duplicate Keno Credit Slip shall be maintained by the keno writer or keno runner in the keno drawer as a balancing item and the original shall be transported by the keno Supervisor or Supervisor, Main Bank cashier or Cage Supervisor with the envelope or container. Prior to the transportation of the keno credit, the keno writer or keno runner shall enter the amount being credited into the computer terminal. Notwithstanding the foregoing, the keno Supervisor may input the amount of the credit into the computer terminal, provided the keno writer or keno runner verifies the amount input by the keno Supervisor to the amount recorded on the duplicate Keno Credit Slip.
- (e) A security department employee shall be required to escort the keno Supervisor, Main Bank cashier or Cage Supervisor and the envelope or container, if the credit is with the Main Bank.

Once at the Main Bank, the security department employee shall sign and list his or her gaming license number on the original Keno Credit Slip, as evidence of his or her escort of the funds.

- (f) Upon receipt of the envelope or container, the receiving individual shall count the contents and compare the amount counted to the total recorded on the Keno Credit Slip. If the contents and the recorded totals agree, the receiving individual shall sign and list their gaming license number on the original and maintain it for subsequent forwarding to the Accounting Department at the end of the gaming day or deposit it into a locked accounting box.

61. Gaming Chips; physical characteristics; issuance and use

(a) Physical characteristics applicable to all gaming Chips; issuance and use.

(1) Each gaming Chip shall be in the form of a disk and, except as otherwise provided below, shall have a uniform diameter of one and 9/16ths inches. Each of the two surfaces of a gaming Chip across which the diameter of the Chip can be measured shall be known as a "face." The surface of a gaming Chip across which its thickness can be measured in a perpendicular line from one face to the other shall be known as its "edge."

(2) No gaming Chip shall be utilized in a Gaming Facility unless and until the design specifications of the proposed gaming Chip are, prior to the manufacture of the gaming Chip, submitted to and approved in writing by the SGA, which submission shall include a detailed schematic depicting the actual size and, as appropriate, location of the following:

- a. Each face, including any indentations or impressions;
- b. The edge; and
- c. Any colors, words, designs, graphics or security measures contained on or in the gaming Chip; and

(3) Each gaming Chip issued by the Nation Gaming Operation shall be designed and manufactured with sufficient graphics or other security measures to the greatest extent possible,

to prevent the counterfeiting of the gaming Chip.

(b) Promotional non-gaming Chips

The Nation Gaming Operation may issue promotional non-gaming Chips that are prohibited from use in gaming. The physical characteristics of such Chips shall be sufficiently distinguishable from approved design specifications of any gaming value or Non-Value Chip issued by the Nation Gaming Operation so as to reasonably ensure that they will not be confused with authorized gaming Chips. At a minimum, such Chips shall:

- (1) Be unique in terms of size, weight and color;
- (2) Have no edge designs unique to gaming Chips; and
- (3) Bear the name of the Nation Gaming Operation issuing them and language on both faces stating that they have no redeemable value.

(c) Value Chips; denominations; physical characteristics

- (1) Each gaming Chip which contains a monetary denomination on each face thereof shall be known as a "Value Chip."
- (2) The Nation Gaming Operation shall be authorized to issue and use Value Chips in denominations of \$1.00, \$2.50, \$5.00, \$10.00, \$20.00, \$25.00, \$100.00, \$500.00, \$1,000, \$5,000 and \$20,000 and in such quantities as the Nation Gaming Operation may deem appropriate to conduct gaming in its Gaming Facility.

(3) Each monetary denomination of Value Chip issued by the Nation Gaming Operation shall contain a predominant color unique to that denomination to be known as the "primary color." A "secondary color" on a Value Chip is any color, other than that Chip's primary color, included on the face or edge of the Chip as a contrast to the Chip's primary color, except that no primary color shall be used as a secondary color on a Value Chip of another denomination where such use on the edge is reasonably likely to cause confusion as to the Chip's denomination when the edge alone is visible.

(4) Value Chips shall fall within the colors set forth below when the Chips are viewed both in daylight and under incandescent light. In conjunction with the primary colors, the Nation Gaming Operation shall utilize contrasting secondary colors for the edge spots on each denomination of Value Chip. The primary color that the Nation Gaming Operation shall utilize for each denomination of Value Chip is as follows:

a.	\$1.00	"White."
b.	\$2.50	"Pink."
c.	\$5.00	"Red."
d.	\$20.00	"Yellow."
e.	\$25.00	"Green."
f.	\$100.00	"Black."
g.	\$500.00	"Purple."
h.	\$1,000.00	"Fire orange."
i.	\$5,000.00	"Gray."
j.	\$20,000	"Mustard Yellow"

- (5) Each Value Chip issued by the Nation Gaming Operation shall contain certain identifying characteristics that may appear in any location at least once on each face of the gaming Chip and are applied in a manner which ensures that each such characteristic shall be clearly visible and remain a permanent part of the gaming Chip. These characteristics shall, at a minimum, include:
 - a. The monetary denomination of the Value Chip, expressed in numbers;
 - b. The name, trade name, logo or other approved identification of the Nation Gaming Operation issuing the Value Chip, which shall be applied in such a manner so as to be visible to Surveillance Department using the closed circuit television system;
 - c. The primary color of the Value Chip.
- (6) In addition to the characteristics specified in (5) above, each Value Chip in a denomination of \$25.00 or more shall contain a design or other identifying characteristic that is unique to the manufacturer of the gaming Chip.
- (7) Each Value Chip issued by the Nation Gaming Operation shall contain an identifying characteristic, to be known as an "edge spot," which shall:
 - a. Be applied in a manner which ensures that the edge spot shall:

1. Be clearly visible on the edge and on each face of the Value Chip; and

2. Remain a permanent part of the Value Chip;

b. Be created by using:

1. The primary color of the Chip; and

2. One or more secondary colors; and

3. Include a design, pattern or other feature that a natural person with adequate training could readily use to identify, when viewed through the closed circuit television system, the denomination of the particular Value Chip when placed in a stack of gaming Chips, in the table inventory or in any other location where only the edge of the Value Chip is visible; provided, however, that the design, pattern or feature created by the primary and secondary colors shall be sufficient by itself to satisfy the requirements of this paragraph if approved in writing for that purpose by the SGA.

(8) Each Value Chip with a denomination below \$25.00 shall contain at least one anti-counterfeiting measure and each Value Chip with a denomination of \$25.00 or more shall contain at least three anti-counterfeiting measures in addition to those items specifically required to appear on the face or edge of a Value Chip by this section.

- (9) In addition to any other requirement imposed by SGA and this section, the edge spots on a Value Chip that has non-identical faces shall appear uniform in design, pattern or other feature when viewed from the perspective of the same face on any other Value Chip in the set. Notwithstanding the foregoing, the edge spots on a Value Chip that has non-identical faces and a denomination below \$25.00 may appear uniform in design, pattern or other feature or as an inverted mirror image thereof when viewed from the perspective of either face on any other Value Chip in the set.

62. Non-value roulette Chips; physical characteristics

- (a) Each gaming Chip which does not contain a denomination on either face thereof shall be known as a "non-value" roulette Chip.
- (b) Each non-value roulette Chip utilized in the Gaming Facility shall be issued solely for the purpose of gaming at roulette.
- (c) Each non-value roulette Chip issued by the Nation Gaming Operation shall contain certain identifying characteristics that may appear in any location at least once on each face of the gaming Chip and shall be applied in a manner which ensures that each such characteristic shall be clearly visible and remain a permanent part of the gaming Chip. The characteristics required by paragraphs (1) and (2) below shall be applied in such a manner so as to be visible to Surveillance Department using the closed circuit television system. The identifying characteristics of a non-value roulette Chip, at a minimum, shall include:
 - (1) The name, trade name, logo or other approved identification of the Nation Gaming Operation issuing the non-value roulette Chip;
 - (2) A design, insert or symbol that will permit a set of non-value roulette Chips being used at a particular Gaming Table to be readily distinguished from the non-value roulette Chips being used at every other Gaming Table in the Gaming Facility;
 - (3) The word "roulette"; and

- (4) Such color and/or design combinations as the SGA may approve so as to readily distinguish the non-value roulette Chips of each player at a particular Gaming Table from:
 - a. The non-value roulette Chips of every other player at the same Gaming Table; and
 - b. The Value Chips issued by the Nation Gaming Operation.

- (d) Each non-value roulette Chip issued by the Nation Gaming Operation shall contain an identifying characteristic, to be known as an "edge spot," which shall:
 - (1) Be applied in a manner which ensures that the edge spot shall:
 - a. Be clearly visible on the edge and on each face of the non-value roulette Chip; and
 - b. Remain a permanent part of the non-value roulette Chip;
 - (2) Be created by using the colors approved for the face of the particular non-value roulette Chip pursuant to paragraph (c) (4) above in combination with one or more other colors that provide a contrast with the color on the face of the Chip; and
 - (3) Include a design, pattern or other feature approved in writing by the SGA that a natural person with adequate training could readily use to identify, when viewing the non-value roulette Chip through the closed circuit

television system, the player to whom the non-value roulette Chip has been assigned when the non-value roulette Chip is placed in a stack of gaming Chips or in any other location where only the edge of the non-value roulette Chip is visible; provided, however, that the design, pattern or feature created by the colors required by paragraph (d) (2) above shall be sufficient by itself to satisfy the requirements of this paragraph if approved in writing for that purpose by the SGA.

63. Non-value roulette Chips; permitted uses; inventory and impressment

- (a) Each non-value roulette Chip shall be assigned to a particular Gaming Table and shall be issued and used for gaming at that table only. All non-value roulette Chips utilized at a particular Gaming Table shall have the same design, insert or symbol. Neither the Nation Gaming Operation nor any employee thereof shall allow any patron to remove a non-value roulette Chip from the roulette table at which it was issued.
- (b) No patron at a roulette table shall be issued or permitted to game with non-value roulette Chips that are identical in color and design to any non-value roulette Chip issued to any other patron at the same table. When a patron purchases non-value roulette Chips, a non-value roulette Chip of the same color and design shall be placed in a slot, receptacle or other device attached to the outer rim of the roulette wheel. At that time, a Marker button denoting the value of a stack of twenty (20) non-value roulette Chips of the same color and design shall be placed, in the slot, receptacle or other device (for example, a Marker button with "100" imprinted on it would be placed in the receptacle to designate that, during the patron's play on that occasion only, the non-value roulette Chips of that color and design are each worth \$5.00).
- (c) An impressment of the non-value roulette Chips assigned to each Gaming table shall be completed at least once every thirty (30) days. The Nation Gaming Operation shall record the results of the impressment in a Chip inventory ledger and shall perform the impressment as follows:

- (1) A Gaming Facility Department Supervisor shall complete a "Non-value Roulette Chip Impression" form to record missing or excess Chips and shall deliver the form and any excess Chips to the Main Bank or Chip bank;
 - (2) Upon receipt of the "Non-value Roulette Chip Impression" form, a Main Bank cashier or Chip bank cashier shall, if appropriate, immediately prepare any Chips needed to impress the table; and
 - (3) The gaming facilities department Supervisor shall then, if applicable, deliver the non-value roulette Chips needed to restore the impress to the appropriate Gaming Table.
- (d) The completed "Non-value Roulette Chip Impression" form shall be maintained by the Accounting Department and shall contain, at a minimum, the following:
- (1) The date and time of preparation;
 - (2) The design schematic of the Chip including its primary color and the applicable table number;
 - (3) The signature and gaming license number of the Gaming Facility Department Supervisor who completes the "Non-value Roulette Chip Impression" form and the impressment for such table; and
 - (4) The signature and gaming license number of the Main Bank cashier or Chip bank cashier who reviewed the form and, if necessary, prepared the Chips to restore the impressment.

- (e) The Nation Gaming Operation shall record in a Chip inventory ledger and submit to the SGA, a monthly summary of the non-value roulette Chip inventory for each Gaming Table. This monthly summary shall include, at a minimum, the following information for each non-value roulette Chip color, design and other identifiers:
- (1) The balance on hand at the beginning of the month;
 - (2) The number of non-value roulette Chips distributed to each roulette table during the month;
 - (3) The number of non-value roulette Chips returned to inventory during the month; and
 - (4) The balance on hand at the end of the month.

64. Nature, exchange and redemption of gaming Chips and Match Play Coupons

- (a) All Wagering on Gaming Tables, except keno, in a Gaming Facility shall be conducted with gaming Chips, provided, however, that Match Game Coupons shall be permitted for use in Wagering at Authorized Games under certain circumstances. A Nation Gaming Operation shall submit for approval to the SGA a sample of each denomination of its Match Game Coupon.
- (b) Value Chips previously issued by a Nation Gaming Operation which are not in active use by that Nation Gaming Operation shall not be used for Wagering at Gaming Tables, including keno, and shall not be accepted nor exchanged for any purpose at a Gaming Table or keno work station. Such Chips shall only be redeemed at the cashier's cage pursuant to subdivision (h) below.
- (c) Gaming Chips shall be issued to a patron only at the request of such patron and shall not be given as change in any other but a gaming transaction. Gaming Chips shall be issued only by Dealers to patrons at Gaming Tables. Value Chips shall only be redeemed by patrons at the cashier's cage; provided, however, that Value Chips may be:
 - (1) Issued to a patron in payment of a winning keno bet and as part of a keno Wagering transaction in which Value Chips are tendered for Wager; and
 - (2) Used by a patron for keno Wagering, including keno Wagers in public keno areas.
- (d) Except as provided in subdivision (k) below and as otherwise may

be specifically approved in writing by the SGA, each Nation Gaming Operation shall redeem its gaming Chips only from its gaming patrons and shall not knowingly redeem its gaming Chips from any non-gaming patron source.

- (e) Non-Value Chips shall be presented for redemption only at the roulette table from which they were issued and shall not be redeemed or exchanged at any other location within the Gaming Facility. When Non-Value Chips are presented for redemption, the Dealer shall accept them in exchange for an equivalent amount of Value Chips which may then be used by the patron in gaming or redeemed in the same manner as any other Value Chip.
- (f) The Nation Gaming Operation shall have the discretion to permit, limit or prohibit the use of Value Chips in gaming at roulette, provided however, that:
 - (1) No person shall be permitted to Wager a Value Chip with a Match Game Coupon at any roulette table at which Match Game Coupons are permitted to be used; and
 - (2) When Value Chips are in use, it shall be the responsibility of the Nation Gaming Operation and its employees to keep an accurate account of the Wagers being made with Value Chips at any such game so that the Wagers being made by each player are readily distinguishable from those being made by every other player at that table.
- (g) Each gaming Chip is solely evidence of a debt that the issuing Nation Gaming Operation owes to the person legally in possession of the gaming Chip, and shall remain the property of the issuing Nation Gaming Operation. Each Nation Gaming Operation shall have

the right at any time to demand that the person in possession of the gaming Chip surrender the item for redemption in accordance with subdivision (h) below.

- (h) Each Nation Gaming Operation shall redeem promptly its own genuine gaming Chips presented by a patron in person, except when the gaming Chips were obtained or being used unlawfully. A Nation Gaming Operation shall redeem its Value Chips by accepting them in exchange for an equivalent amount of Cash, except that:
 - (1) Upon request by a patron who surrenders Value Chips in any amount over one hundred dollars (\$100.00), a Nation Gaming Operation shall exchange them for a Nation Gaming Operation Check of the Nation Gaming Operation in the amount of the Value Chips or gaming plaques surrendered and dated the day of such redemption;
 - (2) A Nation Gaming Operation may apply all or any part of the Value Chips presented by a patron to the redemption of any Counter Check drawn by the patron, or to the payment of any returned check, provided that the Nation Gaming Operation has given that patron prior written notice of such right of setoff and has obtained the patron's written acknowledgment thereof:
 - a. As part of the patron's credit application;
 - b. In a separate writing, which shall be maintained in the patron's credit file; or
 - c. On a Counter Check drawn by the patron, provided that

the patron specifically acknowledges the notice by signing his or her name thereunder or in any other manner approved in writing by the SGA, and further provided that a photocopy of the signed Counter Check shall be maintained in the patron's credit file.

- (i) Notwithstanding subdivision (h) above, if a patron requests by mail to redeem Value Chips in any amount, a Nation Gaming Operation may effectuate such redemption, however, only by a Cage Supervisor, in accordance with System of Internal Controls approved in writing by the SGA which, at a minimum, shall detail procedures for the issuance of a Gaming Facility check and the transfer of the surrendered Value Chips to the Chip bank in a transaction fully supported by proper documentation.
- (j) Each Nation Gaming Operation shall accept, exchange, use or redeem only gaming Chips that it has issued and shall not knowingly accept, exchange, use or redeem gaming Chips or plaques, or objects purporting to be gaming Chips, that have been issued by any other person.
- (k) Non-gaming employees of a Nation Gaming Operation who are authorized to receive gaming Chips as personal gratuities may redeem the gaming Chips at the cashier's cage or at another secure location in the Gaming Facility as approved in writing by the SGA. Gaming Chips redeemed by employees at a non-cage employee redemption site shall be exchanged On a Daily Basis with the cashier's cage in accordance with procedures approved in writing by the SGA.

**65. Receipt of gaming Chips from manufacturer or distributor;
inventory, security, storage and destruction of Chips**

- (a) When gaming Chips are received from the manufacturer or distributor thereof, they shall be opened and checked by at least three (3) people, one of whom shall be from the Accounting Department of the Nation Gaming Operation. Any deviation between the invoice accompanying the Chips and the actual Chips received or any defects found in such Chips or plaques shall be immediately reported to the SGA, with a copy to the SGO.
- (b) After checking the gaming Chips received, the Nation Gaming Operation shall cause to be recorded in a Chip inventory ledger the assigned alphabetical designation, the denomination of the Value Chips received, the number of each denomination of Value Chip received and the number and description of all Non-Value Chips received, the date of any such receipt and the signatures of the individuals who checked any such Chips. If the gaming Chips will not be put into active use, the ledger shall also identify the storage location.
- (c) Any gaming Chips not in active use shall be stored in:
 - (1) An approved Gaming Facility vault;
 - (2) The cashier's cage; or
 - (3) A comparable secure area, approved in writing by the SGA, adjacent to and accessible exclusively from the Gaming Facility.
- (d) Whenever any gaming Chips are taken from or returned to an

approved storage area, at least two individuals shall be present, and the following information shall be recorded in the Chip inventory ledger together with the date and signatures and gaming license numbers of the individuals involved:

- (1) The alphabetical designation, and if applicable, any numeric designation:
 - (2) The number and dollar amount for each denomination of Value Chip removed or returned;
 - (3) The number and description of the Non-Value Chips removed or returned;
 - (4) The specific storage area being entered: and
 - (5) The reason for the entry into the storage area.
- (e) At the end of each gaming day, a Nation Gaming Operation shall compute and record the unredeemed liability for each denomination of Value Chips. At least once every thirty (30) days, at a minimum, each Nation Gaming Operation shall inventory all sets of Value Chips in its possession and shall record the result of such inventory in the Chip inventory ledger. The procedures to be utilized to compute the unredeemed liability and to inventory Value Chips shall be submitted to the SGA for written approval. A physical inventory of Value Chips not in active use shall only be required annually if the inventory procedures incorporate the sealing of the locked compartment.
- (f) If a Nation Gaming Operation elects to commingle gaming Chips, an employee of the Accounting Department shall, on a quarterly

basis, inventory all gaming Chips of a particular sample and readjust the starting inventory for those gaming Chips which are no longer in the possession of the Nation Gaming Operation. The adjusted inventory figure shall be recorded in the Chip inventory ledger and shall be the new beginning inventory figure for the next quarter for purposes of computing the daily outstanding Chip liability required by this section.

- (g) Prior to the destruction of gaming Chips, the Nation Gaming Operation shall notify the SGA in writing of the date and the location at which the destruction will be performed, the denomination, number and amount of Value Chips to be destroyed, the description and number of Non-Value Chips to be destroyed and a detailed explanation of the method of destruction. Unless otherwise authorized by the SGA in writing, the destruction of gaming Chips shall be carried out in the presence of at least two employees of the Nation Gaming Operation, one of whom shall be from the Accounting Department of the Nation Gaming Operation and one of whom shall be from the security department. The denomination, number and amount of Value Chips, in the case of Non-Value Chips, the description and number so destroyed shall be recorded in the Chip inventory ledger together with the signatures and gaming license numbers of the individuals carrying out such destruction, and the date on which said destruction took place. The Nation Gaming Operation shall also maintain a written log of the names, titles and gaming license numbers of all personnel involved in each such destruction.
- (h) A Nation Gaming Operation shall ensure that at all times there is adequate security, as approved by the SGA in writing, for all gaming Chips in its possession.

66. Dice; physical characteristics

- (a) Except as otherwise provided below, each die used in the Authorized Game of craps shall:
- (1) Be formed in the shape of a perfect cube and of a size no smaller than 0.750 of an inch on each side nor any larger than 0.775 of an inch on each side;
 - (2) Be transparent and made exclusively of cellulose except for the spots, name or trade name of the Nation Gaming Operation and serial numbers or letters contained thereon;
 - (3) Have the surface of each of its sides perfectly flat and the spots contained in each side perfectly flush with the area surrounding them;
 - (4) Have all edges and corners perfectly square and forming perfect 90 degree angles;
 - (5) Have the texture and finish of each side exactly identical to the texture and finish of all other sides;
 - (6) Have its weight equally distributed throughout the cube and no side of the cube heavier or lighter than any other side of the cube;
 - (7) Have its six sides bearing circular spots from one to six respectively, with the diameter of each spot equal to the diameter of every other spot on the die;
 - (8) Have spots arranged so that the side containing one spot is

directly opposite the side containing six spots, the side containing two spots is directly opposite the side containing five spots and the side containing three spots is directly opposite the side containing four spots. Each spot shall be placed on the die by drilling into the surface of the cube and filling the drilled out portion with a compound which is equal in weight to the weight of the cellulose drilled out, and which forms a permanent bond with the cellulose cube and shall extend into the cube exactly the same distance as every other spot extends into the cube to an accuracy tolerance of .0004 of an inch;

- (9) Have the name, or trade name and/or SGA logo of the Nation Gaming Operation imprinted or impressed thereon.

- (b) Each die used in the Authorized Game of pai gow poker shall comply with the requirements of subdivision (a) above except as follows:
 - (1) Each die shall be formed in the shape of a perfect cube and of a size no smaller than .637 of an inch on each side nor any larger than .643 of an inch on each side;

 - (2) The spots on each die do not have to be equal in diameter.

- (c) Each die used in the Authorized Games of Chuck-a-Luck and Under and Over Seven shall comply with the requirements of subdivision (a) above except as follows:
 - (1) Each die shall be formed in the shape of a perfect cube and of a size no smaller than 1.5 of an inch on each side nor any larger than 2.5 of an inch on each side;

(2) The spots on each die do not have to be equal in diameter.

67. Pai gow tiles table; Pai gow shaker; physical characteristics

- (a) Pai Gow shall be played at a table having on one-side places for the players and on the opposite side a place for the dealer.
- (b) The Layout for a Pai Gow table shall be approved in writing by the SGA and the SGO and shall contain, at a minimum, the following:
 - 1. Six separate designated betting areas for the players at the table, with each area being numbered one through six;
 - 2. A separate area, located to the left of the dealer, for the placement of four tiles which shall be referred to as the "dead hand"; and
 - 3. The name or trade name of the Nation Gaming Operation.
- (c) Each Pai Gow table shall have a drop box and tip box attached to it on the same side of the gaming table as, but on opposite sides of, the dealer, and in locations approved in writing by the SGA and the SGO.
- (d) Pai Gow shall be played with a container, to be known as a "Pai Gow shaker, " which shall be used to shake three dice before each hand of Pai Gow is dealt in order to determine the starting position for the dealing of the Pai Gow tiles. The Pai Gow shaker shall be designed and constructed to contain any feature the SGA and the SGO may require to maintain the integrity of the game and shall, at a minimum, adhere to the following specifications:

1. The Pai Gow shaker shall be capable of housing three dice and shall be designed so as to prevent the dice from being seen while the dealer is shaking it; and
 2. The Pai Gow shaker shall have the name or identifying logo of the casino imprinted or impressed thereon.
- (e) Pai Gow shall be played with a set of 32 rectangular blocks to be known as tiles. Each tile in a set shall be identical in size and shading to every other tile in the set.
- (f) Each tile used in gaming at Pai Gow shall:
1. Be made of a non-transparent black material, formed in the shape of a rectangle, and be of a size no smaller than 2.500 inches in length, 1.000 inch in width and .375 of an inch in thickness;
 2. Have the surface of each of its sides perfectly flat, except that the front side of each tile shall contain spots which shall extend into the tile exactly the same distance as every other spot;
 3. Have on the back of each tile an identifying feature unique to the Nation Gaming Operation;
 4. Have the texture and finish of each side, with the exception of the front side, exactly identical to the texture and finish of all other sides;
 5. Have the back and sides of each tile within a set be identical and no tile within a set shall contain any

marking, symbol or design that will enable a person to know the identity of any element on the front side of the tile or that will distinguish any tile from any other tile within a set; and

6. Have identifying spots on the front of the tiles which are either red or white or both.
 - a. Each set of tiles shall be composed of 32 tiles.
 - b. Each set of tiles shall be packaged separately and completely sealed in such a manner so that any tampering shall be evident.

68. Dice; Pai gow tiles; receipt; storage; inspections and removal from use

- (a) When dice for use in the Gaming Facility are received from the manufacturer or distributor thereof, they shall, immediately following receipt, be inspected by a member of the security department or Accounting Department and a Gaming Facility Supervisor to assure that the seals on each box are intact, unbroken and free from tampering. Boxes that are not intact, or on which the seals are broken shall be inspected at this time to assure that the dice within conform to Appendix standards and are completely in a condition to assure fair play. Boxes satisfying these criteria, together with boxes having unbroken, intact and untampered seals shall then be placed for storage in a locked cabinet in the cashier's cage or within a primary or secondary dice storage area. Dice which are to be distributed to Gaming Table Pits or tables for use in gaming shall be distributed from a locked cabinet in the cashier's cage or from secure primary dice storage area, the location and physical characteristics of which shall be approved in writing by the SGA. Secondary dice storage areas may be used for the storage of surplus dice if approved in writing by the SGA. Dice maintained in secondary dice storage areas shall not be distributed to Gaming Table Pits or Gaming Tables for use in gaming until the dice have been moved to a primary dice storage area. All secondary dice storage areas shall be located in secure areas, the location and physical characteristics of which shall be approved in writing by the SGA.
- (b) All primary and secondary dice storage areas, other than the cashier's cage, shall have two separate locks. The security department shall maintain one key and the Gaming Facility

Department shall maintain the other key; provided, however, that no person employed by the Gaming Facility Department below the Gaming Facility Shift manager in the organization hierarchy shall have access to the Gaming Facility Department key. Dice stored in a cabinet within the cashier's cage shall be secured by a lock, the key to which shall be maintained during that Shift by Gaming Facility Shift manager or Gaming Facility whose name, title and gaming license number appear a list filed with the SGA of persons authorized to access such key.

- (c) Immediately prior to the commencement of each gaming day and at such other times as may be necessary, the Gaming Facility Shift manager or Gaming Facility Supervisor, in the presence of a security officer and a SGA Inspector, shall remove the appropriate number of dice for that gaming day from a primary dice storage area.
- (d) All envelopes, bags and containers used in this section for dice at the Pit stand or in a primary dice storage area and for dice collected by the security department shall be transparent.
 - (1) The envelopes, bags or containers and the method used to seal them shall be designed or constructed so that any tampering shall be evident.
 - (2) The envelopes, bags or containers and their seals shall be approved in writing by the SGA.
- (e) All dice shall be inspected and distributed to Gaming Tables in accordance with one of the following applicable alternatives:
 - (1) Alternative No. 1: Distribution to and inspection at craps,

sic bo or pai gow poker tables:

- a. The Gaming Facility Shift manager or Gaming Facility Supervisor and the security officer who removed the dice from the primary dice storage area shall distribute sufficient dice directly to the Pit manager in each Pit, or place them in a locked compartment in the Pit stand, the keys to which shall be in the possession of the Pit manager or a Gaming Facility Supervisor during his or her Shift;
- b. Immediately upon opening a craps, sic bo or pai gow poker Gaming Table, the Pit manager shall distribute a set of dice to the table. At the time of receipt, a Boxperson at each craps table and the floorperson at each sic bo table, in order to ensure that the dice are in a condition to assure fair play and otherwise conform to this Appendix, shall, in the presence of the craps table personnel, sic bo Dealer or pai gow poker Dealer, inspect the dice given to him or her with a micrometer or any other approved instrument which performs the same function, a balancing caliper, a steel set square and a magnet, which instruments shall be kept locked in a compartment at each craps and sic bo table or Pit stand, and shall be at all times readily available for use by the SGA upon request;
- c. Following this inspection:
 1. For craps, the Boxperson shall, in the presence of the Dealer, place the dice in a cup on the

table for use in gaming, and while the dice are at the table, they shall never be left unattended;

2. For sic bo, pai gow poker, and pai gow tiles the floorperson shall, in the presence of the Dealer, place the required number of dice into the shaker and seal or lock the shaker. The floorperson shall then secure the shaker to the table in a manner approved in writing by the SGA, in the presence of the Dealer who observed the inspection; and

d. The Pit manager shall place extra dice for dice reserve in the Pit stand. Dice in the Pit stand shall be placed in a locked compartment, keys to which shall be in the possession of the Pit manager or a Gaming Facility Supervisor. No dice taken from the reserve shall be used for actual gaming until and unless inspected in accordance with subparagraph (e) (1) (b) above.

(2) Alternative No. 2: Distribution to and inspection at the Pit stand:

a. The Gaming Facility Shift manager or Gaming Facility Supervisor thereof and the security officer who removed the dice from the primary dice storage area shall distribute the dice directly to the Gaming Facility Supervisor identified in subparagraph (e) (2) (b) below, who will perform the inspection in each Pit.

- b. The inspection of the dice at the Pit stand shall be performed by:
 - 1. For craps, a Boxpersion or floorperson in the presence of another Boxpersion or floorperson, both of whom are assigned the responsibility of supervising the operation and conduct of a craps game; and
 - 2. For sic bo or pai gow poker, a floorperson, in the presence of another floorperson, both of whom are assigned the responsibility of supervising the operation and conduct of such sic bo or pai gow.
- c. To ensure that the dice are in a condition to assure fair play and otherwise conform to this Appendix, the dice shall be inspected with a micrometer or any other approved instrument which performs the same function, a balancing caliper, a steel set square and a magnet, which instruments shall be kept in a locked compartment at the Pit stand and shall be at all times readily available for use by the SGA upon request. The inspection shall be performed on a flat surface which allows the dice inspection to be observed through closed circuit television cameras and by any persons in the immediate vicinity of the Pit stand.
- d. After completion of the inspection, the dice shall be distributed as follows:

1. For craps, the Boxpersion or floorperson who inspected the dice shall, in the presence of the other Boxpersion or floorperson who observed the inspection, distribute such dice to the Boxpersion assigned at craps each craps table. The Boxpersion shall, in the presence of the Dealers and stickperson, place the dice in a cup on the table for use in gaming, and while the dice are at the table, they shall never be left unattended;
2. For sic bo and pai gow tiles, the floorperson who inspected the dice shall, in the presence of the other floorperson who observed the inspection, place the required number of dice into the shaker and seal or lock the shaker. The floorperson shall then secure the shaker to the table in the presence of the other floorperson who observed the inspection.
3. For pai gow poker, the floorperson who inspected the dice shall, in the presence of the other floorperson who observed the inspection, distribute such dice directly to the Dealer at each pai gow poker table. The Dealer shall immediately place the dice in the pai gow poker shaker.
4. The Pit manager shall place extra sets of dice for dice reserve in the Pit stand, as follows:
 - A. Dice in the Pit stand shall be placed in a

locked compartment, keys to which shall be in the possession of the Pit manager or a Gaming Facility Supervisor during his or her Shift.

B. Except as otherwise provided, all dice taken from the reserve shall be reinspected by a Gaming Facility Supervisor in the presence of another Gaming Facility Supervisor in accordance with the inspection procedures set forth in subparagraphs (e) (2) (b) and (c) above, prior to their use for actual gaming.

C. Notwithstanding paragraph (e) (2) above, previously inspected reserve dice may be used for gaming without being reinspected if they are maintained in a locked compartment in the Pit stand under dual key control as approved in writing by the SGA, the keys for which shall be in the possession of the Pit manager or Gaming Facility Supervisor.

5. Notwithstanding paragraph (e) (2) above, previously inspected reserve dice may be used for gaming without being reinspected if they are maintained in a locked compartment in the Pit stand in accordance with the following procedures.

A. For craps, a set of at least five dice,

after being inspected, shall be placed in a sealed envelope, bag or container. A label that identifies the date of inspection and contains the signatures and gaming license numbers of responsible those for the inspection shall be attached to each envelope, bag or container.

- B. For sic bo and pai gow tiles, the required number of dice, after being inspected, shall be placed in a clear sealed envelope, bag or container or sealed or locked in a sic bo shaker. A label or seal that identifies the date of inspection and contains the signatures and gaming license numbers of those responsible for the inspection shall, respectively, be attached to each envelope, bag or container or placed over the area that allows access to open the sic bo shaker.
- C. For pai gow poker, a set of three dice, after being inspected, shall be placed in a clear sealed envelope, bag or container. A label that identifies the date of inspection and contains the signatures and gaming license numbers of those responsible for the inspection shall be attached to each envelope, bag or container.

- (3) Alternative No. 3: Inspection in primary storage area and distribution to tables:

- a. Inspection of dice for all Gaming Tables in an approved primary dice storage area shall be performed by a Gaming Facility Supervisor and a Gaming Facility Shift manager, in the presence of a security officer.
- b. The dice shall be inspected with a micrometer or any other approved instrument which performs the same function, a balancing caliper, a steel set square and a magnet to ensure that the dice are in a condition to assure fair play and otherwise conform to this Appendix. These instruments shall be maintained in the secure primary dice storage area and shall be at all times readily available for use by the SGA upon request.
- c. After completion of the inspection, the person shall performing the inspection seal the dice as follows:
 1. For craps, after each set of at least five dice are inspected, they shall be placed in a clear sealed envelope, bag or container; provided, however, that reserve dice may be placed in individual clear sealed envelopes, bags or containers. A label that identifies the date of the inspection and contains the signatures and gaming license numbers of those responsible for the inspection shall be attached to each envelope, bag or container;
 2. For sic bo and pai gow tiles, after each set of

dice are inspected, they shall be sealed or locked in a shaker. A seal that identifies the date of the inspection and contains the signatures and gaming license numbers of those responsible for the inspection shall then be placed over the area that allows access to open the shaker; and

3. For pai gow poker, after each set of three dice is inspected, they shall be placed in a clear sealed envelope, bag or container. A label that identifies the date of the inspection and contains the signatures and gaming license numbers of those responsible for the inspection shall be attached to each envelope, bag or container.
4. At the beginning of each gaming day and at such other times as may be necessary, a Gaming Facility Shift manager or Gaming Facility Supervisor thereof and a security officer shall distribute the dice as follows:
 - A. For craps, the clear sealed envelopes, bags or containers of dice shall be distributed to a Pit manager in each craps Pit or placed in a locked compartment in the Pit stand by the Pit manager. When the sealed dice are distributed to the craps table, a Boyperson at each craps table, after assuring the seals are intact and free from tampering, shall open the clear sealed

envelope, bag or container, in the presence of the Dealer, and place the dice in a cup on the table for use in gaming. While dice are on the table, they shall never be left unattended.

B. For sic bo and pai gow tiles, the sealed shakers shall be distributed to the Pit boss supervising the game. The Pit boss shall then secure the sic bo shaker to the table in a manner approved in writing by the SGA.

C. For pai gow poker, the clear sealed envelope, bag or container shall be distributed to a Pit manager in each pai gow poker pit or placed in a locked compartment in the Pit stand. When the sealed dice are distributed to the pai gow poker table by the Pit manager, a floorperson, after assuring the seal and envelopes, bags or containers are intact and free from tampering, shall open the clear sealed envelope, bag or container, in the presence of the Dealer, and place the dice in the pai gow poker shaker.

5. When the clear envelope, bag or container or the seal is damaged, broken or shows indication of tampering, the dice shall not be used for gaming activity unless the SGA is immediately notified and the dice are reinspected as follows:

- A. For craps, sic bo, and pai gow tiles accordance with the procedures in paragraphs (e) (1) or (e) (2) above; and
 - B. For pai gow poker, in accordance with the procedures in paragraphs (e) (2) above.
6. The Pit manager shall place extra sets of dice for dice reserve in the Pit stand. Dice in the Pit stand shall be placed in a locked compartment, keys to which shall be in the possession of the Pit manager or Gaming Facility Supervisor during his or her Shift.
7. A micrometer or any other approved instrument which performs the same function, a balancing caliper, a steel set square and a magnet shall also be maintained in a locked compartment in each Pit stand, and each such instrument shall be at all times readily available for use by the SGA upon request.
8. Any primary dice storage area in which dice are inspected in accordance with this alternative, shall be equipped with closed circuit television camera coverage capable of observing and recording the entire inspection procedure.
- (f) The Nation Gaming Operation shall remove any dice at any time of the gaming day if there is any indication of tampering, flaws or other defects that might affect the integrity or fairness of the game, or at the request of the SGA.

- (g) At the end of each gaming day or at such other times as may be necessary, the Gaming Facility Supervisor identified in paragraph (g) (1) below shall visually inspect each die for evidence of tampering. Such evidence discovered at this time or at any other time shall be immediately reported to the SGA, by the completion and delivery of an SGA approved Dice Discrepancy Report, with a copy to the SGO.
- (1) The inspection required by this subdivision shall be performed by a Gaming Facility Supervisor other than the one who originally inspected the dice.
 - (2) Any dice showing evidence of tampering shall be placed in a clear sealed envelope, bag or container.
 - a. A label shall be attached to each envelope, bag or container which shall identify the table number, date and time, and shall be signed by a person assigned to directly operate and conduct the game at that table and a Gaming Facility Supervisor assigned the responsibility for supervising the operation and conduct of such game. Adjacent to such required signatures, the signer shall write their gaming license number.
 - b. A Gaming Facility Supervisor or security officer responsible for delivering the dice to the SGA shall also sign the label. Adjacent to such required signature, the signer shall write their gaming license number.

- c. The SGA personnel receiving the dice shall sign the Dice Discrepancy Report and retain the dice and the original of the Dice Discrepancy Report at the SGA office, with a copy to the SGO. Duplicate copies of the Dice Discrepancy Report shall be retained at the SGA's on-site office, and a fourth copy shall be returned to the Pit and maintained in a locked compartment in the Pit stand until collection by a security officer.
- (3) All other dice shall be put into clear envelopes, bags or containers at this time.
- a. A label shall be attached to each clear envelope, bag or container which shall identify the table number, date and time, and shall be signed by the appropriate persons identified in subparagraph (g) (2) (a) above.
 - b. The clear envelope, bag or container shall be appropriately sealed and maintained in a locked compartment in the Pit stand until collection by a security officer.
- (h) All extra dice in dice reserve that are to be destroyed or canceled shall be placed in a sealed clear envelope, bag or container, with a label attached to each clear envelope, bag or container which identifies the date and time and is signed by the Pit manager.
- (i) At the end of each gaming day or, in the alternative, at least once each gaming day at the same time each day, as designated by the Nation Gaming Operation and approved in writing by the SGA,

and at such other times as may be necessary, a security officer shall collect and sign all envelopes, bags or containers of used dice and any dice in dice reserve that are to be destroyed or canceled and shall transport them to the card and dice destruction area for cancellation or destruction. The security officer shall also collect all fourth copies of Dice Discrepancy Reports, if any. No dice that have been placed in use in gaming shall remain on a table for more than twenty-four (24) hours.

- (j) At the end of each gaming day or, in the alternative, at least once each gaming day at the same time each day, as designated by the Nation Gaming Operation and approved in writing by the SGA, and at such other times as may be necessary, a Gaming Facility Shift manager or Gaming Facility Supervisor thereof may collect all extra dice in dice reserve.
 - (1) If collected, dice shall be returned to the primary dice storage area; provided, however, that any dice which have not been inspected and sealed pursuant to the requirements in paragraph (e) (3) (Alternative No. 3) above shall, prior to use for actual gaming, be inspected as follows:
 - a. For craps, sic bo, or pow gai tiles in accordance with the requirements in paragraphs (e) (1) or (e) (2) above; or
 - b. For pai gow poker, in accordance with the requirements in paragraph (e) (2) above.
 - (2) If not collected, all dice in dice reserve must be reinspected in accordance with one of the alternatives listed in subdivision (e) above, prior to their use in

gaming.

- (k) The Nation Gaming Operation shall submit to the SGA for written approval internal control procedures for:
 - (1) A dice inventory system which shall include, at a minimum, the recordation of the following:
 - a. The total number of dice on hand;
 - b. The total number of dice removed from storage;
 - c. The total number of dice returned to storage or received from the manufacturer;
 - d. The date of the transaction; and
 - e. The name signatures and gaming license numbers of the individuals involved.
 - (2) A reconciliation On a Daily Basis of total number of the dice distributed, the dice destroyed and canceled, the dice returned to the primary dice storage area and, if any, the dice in dice reserve; and
 - (3) A physical inventory of the dice at least once every three (3) months.
 - a. This inventory shall be performed by an individual with no incompatible functions and shall be verified to the total number of dice on hand required in subparagraph (k) (1) (a) above.

- b. Any discrepancies shall be immediately reported to the SGA, with a copy to the SGO.
- (1) All destruction and cancellation of dice, other than those retained for SGA inspections or in the custody of the SGA, shall be completed within forty-eight (48) hours of collection.
 - (1) Cancellation shall occur by drilling a circular hole of at least one fourth inch in diameter through the center of each die.
 - (2) Destruction shall occur by shredding.
 - (3) The destruction and cancellation of dice shall take place in a secure dice cancellation and destruction area, the location and physical characteristics of which shall be approved in writing by the SGA.

69. Playing cards; physical characteristics

- (a) Cards used to play blackjack, baccarat, minibaccarat, pai gow poker, red dog, caribbean stud poker, let it ride poker and any other class III card game authorized in Appendix A of the Compact shall be in decks of fifty two (52) cards with each card identical in size and shape to every other card in such deck of cards (decks). Notwithstanding the foregoing, decks used to play pai gow poker and joker seven shall include one or two additional cards known as a joker, which shall be identical in color, design, size and shape to every other card in such deck.
- (b) Each deck shall be composed of four suits: diamonds, spades, clubs and hearts.
- (c) Each suit shall be composed of thirteen (13) cards: ace, king, queen, jack, ten (10), nine (9), eight (8), seven (7), six (6), five (5), four (4), three (3), two (2). The face of the ace, king, queen, jack and 10 value cards may contain an additional marking, as approved in writing by the SGA, which will permit a Dealer, prior to exposing his or her hole card at the game of blackjack, to determine the value of that hole card.
- (d) The backs of each card in the deck shall be identical and no card shall contain any marking, symbol or design that will enable a person to know the identity of any element printed on the face of the card, or that will in any way differentiate the back of that card from the back of any other card in the deck.
- (e) The backs of all cards in the deck shall be designed and manufactured so as to diminish, as far as possible, the ability of any person to place concealed markings thereon.

- (f) The design to be placed on the backs of cards used by Nation Gaming Operation shall contain the name, trade name or logo of the Nation Gaming Operation, and shall be submitted to the SGA for written approval prior to use of such cards at a Gaming Table.
- (g) Each deck of cards shall be packaged separately, shall contain a seal affixed to the opening of such package and shall be securely sealed in a cellophane or other such similar transparent, tamper resistant covering.
- (h) Nothing in this section shall prohibit a manufacturer from manufacturing decks of cards with one or more jokers contained therein; provided, however, that such jokers shall not be used by the Nation Gaming Operation in the play of any game other than pai gow poker, joker seven or another game authorized in Appendix A of the Compact requiring the use of a joker or jokers.

70. Playing cards; receipt, storage, inspections, and removal from use

- (a) When decks of cards (decks) are received for use in the Gaming Facility from the manufacturer or distributor thereof, they shall be placed for storage in a locked cabinet in the cashier's cage or within a primary or secondary card storage area by at least three (3) individuals and one of whom shall be from the security department or Accounting Department. The cabinet or primary storage area shall be located in the cashier's cage or in another secure place, the location and physical characteristics of which shall be approved in writing by the SGA. Secondary storage areas shall be used for the storage of surplus cards. Cards maintained in secondary storage areas shall not be distributed to Gaming Table Pits or Gaming Tables for use in gaming until the cards have been moved to a primary card storage area. All secondary card storage areas shall be located in secure areas, the location and physical characteristics of which shall be approved in writing by the SGA.
- (b) All primary and secondary card storage areas, other than the cashier's cage, shall have two separate locks. The SGA shall maintain one key and the Gaming Facility Department shall maintain the other key; provided, however, that no person employed by the Gaming Facility Department below the Gaming Facility Shift manager in the organizational hierarchy shall have access to the Gaming Facility Department key for the primary and secondary card storage areas. Cards stored in a cabinet within the cashier's cage shall be secured by a lock, the key to which shall be maintained by a Gaming Facility Shift manager or Gaming Facility Supervisor.

- (c) Immediately prior to the commencement of each gaming day and at other times as may be necessary, the assistant Gaming Facility Shift manager or Gaming Facility Supervisor, in the presence of an SGA Inspector and security officer, shall remove the appropriate number of decks of cards for that gaming day from a locked cabinet in the cashier's cage or from the primary card storage area.
- (d) If removed from the primary card storage area, the Gaming Facility Shift manager or Gaming Facility Supervisor, SGA Inspector and the security officer who removed the decks shall distribute sufficient decks to the Pit manager who shall then distribute the decks to the Dealer at each Gaming Table.
- (e) Prior to their use at a Gaming Table, all decks shall be inspected by the Dealer, with such inspection verified by a floorperson. Card inspection at the Gaming Table shall require each deck to be used at that table to be sorted into new deck sequence, by suit, to assure that all cards are in the deck. The Dealer shall also check the back of each card to assure that it is the same color as the other cards in the deck and is not flawed, scratched or marked in any way.
 - (1) If, after checking the cards, the Dealer finds that a card is unsuitable for use, a Gaming Facility Supervisor shall immediately notify the SGA and replace the deck with a new one from the Pit stand.
 - (2) The unsuitable deck shall be placed in a clear sealed envelope, bag or container, identified by table number, date, and time and shall be signed by the Dealer and

floorperson assigned to that table. The Gaming Facility Supervisor shall either maintain the envelope, bag or container in a secure place locked compartment within the Pit stand until collection by a security officer or shall turn the sealed envelope, bag or container over to an SGA Inspector if so directed.

- (f) All envelopes, bags and containers used to hold or transport cards collected by security shall be transparent.
 - (1) The envelopes, bags or containers and the method used to seal them shall be designed and constructed so that any tampering shall be evident.
 - (2) The envelopes, bags or containers and seals shall be approved in writing by the SGA.

- (g) Any decks which have been opened and placed on a Gaming Table for use in a multi-deck dealing shoe shall be changed at least every twenty-four (24) hours. In addition:
 - (1) Cards opened for use on a minibaccarat table shall be changed once during the gaming day, or more frequently if warranted under subdivision {j), below, or upon the direction of the SGA;
 - (2) Cards opened for use on a baccarat table, pai gow poker table, caribbean stud poker, let it ride poker, or any other card game authorized by Appendix A that permits players to handle the cards and which are dealt from a dealing shoe shall be changed at least every four (4) hours; and

- (3) Cards opened for use on a pai gow poker table, caribbean stud poker, let it ride poker and dealt from the Dealer's hand shall be changed at least every two (2) hours.
- (h) Cards damaged during the course of play shall be replaced by the Dealer who shall request a floorperson or Gaming Facility Supervisor to replace the deck or decks with a new deck or decks from a locked compartment in the Pit stand.
 - (1) The damaged cards shall be placed in a clear sealed envelope, bag identified by table number, date and time and shall be signed by the Dealer and the individual who brought the replacement card to the table.
 - (2) The Gaming Facility Supervisor shall maintain the envelopes, bags or containers in a locked compartment within the Pit stand until collection by a security officer, and an SGA Inspector.
- (i) At the end of each gaming day or, in the alternative, at least once each gaming day at the same time each day, as designated by the Nation Gaming Operation and approved in writing by the SGA, and at such other times as may be necessary or if so directed by an SGA Inspector, the Gaming Facility Supervisor shall collect all used decks.
 - (1) These decks shall be placed in a clear sealed envelope, bag or container. A label shall be attached to each envelope, bag or container which shall identify the table number, date and time and shall be signed by the Dealer and floorperson assigned to the table.

- (2) The Gaming Facility Supervisor shall maintain the envelopes, bags or containers in a locked compartment within the Pit stand until collection by a security officer or an SGA Inspector.
- (j) The Nation Gaming Operation shall remove any decks at any time during the day if there is any indication of tampering, flaws, scratches, marks or other defects to a card or cards that might affect the integrity or fairness of the game, or at the direction of the SGA.
- (k) All extra decks in card reserve with broken seals shall be placed in a clear sealed envelope, bag or container, with a label attached to each envelope or container identifying the date and time, which and is signed by the floorperson and the Pit manager.
- (l) At the end of each gaming day or, in the alternative, at least once each gaming day at the same time each day, as designated by the Nation Gaming Operation and approved in writing by the SGA, and at such other times as may be necessary, a security officer shall collect and sign all envelopes, bags or containers with damaged cards, cards used during the gaming day, and all extra decks in card reserve with broken outer wrappings or seals and shall return the envelopes, bags or containers to the SGA approved card cancellation and destruction area.
- (m) At the end of each gaming day or, in the alternative, at least once each gaming day at the same time each day, as designated by the Nation Gaming Operation and approved in writing by the SGA, and at such other times as may be necessary, a Gaming Facility

Shift manager or Gaming Facility Supervisor thereof may collect all extra decks held in card reserve in a locked compartment in the Pit stand. If collected, all sealed decks shall either be transported by a security officer to the approved card cancellation and destruction area or returned to the cashier's cage or a primary or secondary card storage area.

(n) When the envelopes, bags or containers of used cards and reserve cards with broken outer wrappings or seals are transported by a security officer to the approved card cancellation and destruction area, they shall be inspected for tampering, marks, alterations, missing or additional cards or anything that might indicate unfair play, prior to cancellation or destruction.

(1) For cards used at Gaming Tables in which the players handle the cards, the Nation Gaming Operation shall cause such cards to be inspected either:

a. All decks used during the day; or

b. A sample of decks selected at random or in accordance with an approved stratification plan, provided that the procedures for selecting the sample size and for assuring a proper selection of the sample are submitted to and approved in writing by the SGA. This sample shall be collected, stored and inspected separately from the sample required by subparagraph (n) (2) (b) below, and shall not be commingled with any cards from that sample.

(2) For cards used in baccarat or minibaccarat, the Nation Gaming Operation shall cause to be inspected either:

- a. All decks used during the day; or
 - b. A sample of decks selected at random or in accordance with an approved stratification plan, provided that the procedures for selecting the sample size and for assuring a proper selection of the sample are submitted to and approved in writing by the SCA. This sample shall be collected, stored and inspected separately from the sample required by subparagraph (n)(1) (1b) above, and shall not be comingled with any cards from that sample.
- (3) The Nation Gaming Operation shall also inspect:
- a. Any cards which the SGA requests the Nation Gaming Operation to remove for the purpose of inspection;
 - b. Any cards the Nation Gaming Operation removed for indication of tampering; and
 - c. All cards used for pai gow poker, caribbean stud poker, let it ride poker and any other card game required, in writing by the SGA.
- (4) The procedures for inspecting all decks required to be inspected under this paragraph shall, at a minimum, include:
- a. The sorting of the cards sequentially by suit into new deck order;
 - b. The inspection of the backs with an ultraviolet light;

- c. The inspection of the sides of the cards for crimps, bends, cuts and shaving;
 - d. The inspection of the front and back of all plastic cards for consistent shading and coloring; and
 - e. Any other test required by the SGA.
- (5) The Nation Gaming Operation shall develop internal control procedures for returning the repackaged cards to the storage area. Such procedures are subject to approval of the SGA in writing.
- (6) The individuals performing said inspection shall complete a work order form which shall detail the procedures performed and list the tables from which the cards were removed and the results of the inspection. The individual shall sign the form upon completion of the inspection procedures.
- (7) The Nation Gaming Operation shall submit the training procedures for those employees performing the inspection, which shall be approved in writing by the SGA;
- (8) Evidence of tampering, marks, alterations, missing or additional cards or anything that might indicate unfair play discovered at this time, or at any other time, shall be immediately reported to the SGA, with a copy to the SGO, by the completion and delivery of a Card Discrepancy Report by a security officer.

- a. The report shall accompany the cards when delivered to the SGA.
 - b. The cards shall be retained for investigation by the SGA.
 - c. The SGA personnel receiving the cards shall sign the Card Discrepancy Report, secure and retain the original. An additional copy shall be retained by the Nation Gaming Operation.
- (o) The Nation Gaming Operation shall submit to the SGA for written approval a System of Internal Controls for:
- (1) A card inventory system which shall include, at a minimum, the recordation of the following:
 - a. The total number of decks of cards on hand;
 - b. The total number of decks cards removed from storage;
 - c. The total number of decks cards returned to storage or received from the manufacturer;
 - d. The date of the transaction; and
 - e. The name, signatures and gaming license number of the individuals involved;
 - (2) A reconciliation On a Daily Basis, of the total number of decks of cards distributed, the total number of decks of cards destroyed and canceled, the total number of decks of

cards returned to the approved card storage area or areas and, if any, the total number of decks of cards in card reserve; and

- (3) A physical inventory of the cards at least once every three
 (3) months.
 - a. This inventory shall be performed by an individual with no incompatible functions and shall be verified to the total number of decks of cards on hand required in subparagraph (o) (1) (a) above.
 - b. Any discrepancies shall be immediately reported to the SGA, with a copy to the SGO.

- (p) Where decks of cards in an envelope, bag or container are inspected and found to be without any indication of tampering marks, alterations, missing or additional cards or anything that might indicate unfair play, those cards, shall, within forty-eight (48) hours of collection, be destroyed or canceled. All decks of cards released by the SGA shall be immediately destroyed or canceled.
 - (1) Destruction of cards shall be by shredding.
 - (2) Cancellation of cards shall be by drilling a circular hole of at least one-quarter of an inch in diameter through the center of each card in the deck.
 - (3) The destruction and cancellation of cards shall take place in the approved card cancellation and destruction area, the location and physical characteristics of which shall be

approved in writing by the SGA.

71. Dealing shoes; automated card shuffling devices

- (a) The following words and terms used within this section shall have the following meanings:
 - (1) "Base plate" means the interior shelf of the dealing shoe on which the cards rest.
 - (2) "Face plate" means the front wall of the dealing shoe against which the next card to be dealt rests and which typically contains a cutout.
- (b) Dealing shoes shall be secured to Gaming Tables when the tables are open for gaming activity and secured in locked compartments when the tables are not open for gaming activity.
- (c) Automated card shuffling devices may be utilized to shuffle and dispense at all card games authorized by Appendix A of the Compact in addition to a dealing shoe, provided that:
 - (1) The automated card shuffling device and the procedures for using it for shuffling, dispensing and dealing the cards are approved in writing by the SGA; and
 - (2) The internal control procedures ensuring the security of an automated card shuffling device are approved in writing by the SGA.
- (d) Each dealing shoe shall be designed and constructed with such features as the SGA may require to maintain the integrity of the Gaming Table at which such shoe is used. Such features shall include, at a minimum, the following:

- (1) At least the first four (4) inches of the base plate shall be white;
 - (2) The sides of the shoe below the base plate shall be transparent or have a transparent sealed cutout, unless the dealing shoe is otherwise constructed to prevent any object from being placed into, or removed from, the portion of the dealing shoe below the base plate and to permit the inspection of this portion of the shoe;
 - (3) A stop underneath the top of the face plate shall preclude the next card to be dealt from being moved upwards for more than one-eighth inch distance; and
 - (4) Each dealing shoe used in blackjack shall have a mark on the side of the shoe that enables the Dealer, after aligning the stack of cards against the shoe, to insert the cutting card in such stack so that approximately one quarter of the stack is behind the cutting card.
- (e) A baccarat dealing shoe, in addition to meeting the requirements of paragraphs (d) (1) through (3) above, shall also adhere to the following specifications:
- (1) A removable lid shall be opaque from the point where it meets the face plate, to a point at least four (4) inches from the face plate;
 - (2) The sides and back of the dealing shoe above the base plate shall be opaque; and

- (3) A device within the shoe shall, when engaged, prevent the cards from moving backward in the shoe.
- (f) A dealing shoe, in addition to meeting the requirements of subdivision (d) above, may, at the discretion of the Nation Gaming Operation, also contain a device approved in writing by the SGA mounted on the front of the face plate so as to preclude the players from viewing the next card to be dealt.
- (g) All dealing shoes and automated shuffling devices in the Gaming Facility shall be inspected at the beginning of each gaming day by a floorperson assigned to the table prior to cards being placed in them. The purpose of this inspection shall be to assure that there has been no tampering with the dealing shoe or automated shuffling device that contains the dealing shoe or automated card shuffling device contains no playing cards, and that the automated card shuffling device dispenses the correct number of cards, if so designed.
- (h) For table games at which a dealing shoe is utilized, the shoe shall be located on the side of the table to the left of the Dealer, and the discard rack shall be located on the side of the table to the right of the Dealer. For table games at which an automated card shuffling device is utilized, the location of the automated card shuffling device shall be approved by the SGA in writing, and the discard rack shall be on the side of the Gaming Table opposite such device.

72. Baccarat tables; physical characteristics

- (a) Baccarat shall be played on a table having numbered places for ten (10) to fourteen (14) seated players.
- (b) The Layout for a baccarat table shall be approved in writing by the SGA and the SGO and shall contain, at a minimum:
 - (1) The name, trade name or logo of the Nation Gaming Operation;
 - (2) Specific areas designated for the placement of Wagers on the "Banker's Hand," "Players Hand" and "Tie Hand";
 - (3) The phrase "Tie Bets pay 8 to 1";
 - (4) Numbered areas that correspond to the seat numbers for the purpose of marking vigorish;
 - (5) An area designated for the placement of cards for the "Player's" and "Banker's" hands.
- (c) If Marker buttons are used for the purpose of marking vigorish, these Marker buttons shall be placed in the table inventory float container or in a separate rack designed for the purpose of storing Marker buttons. Such rack shall be placed in front of the table inventory float container during gaming activity.
- (d) Each baccarat table shall have a Drop Box and a tip box attached to it on the same side of the Gaming Table as, but on opposite sides of, the Dealer, and in locations approved in writing by the SGA.

73. Blackjack tables; physical characteristics; inspections; card reader devices

- (a) Blackjack shall be played at a table having on one side places for the players and on the opposite side a place for the Dealer.
- (b) The Layout for a blackjack table shall be approved in writing by the SGA and the SGO and shall contain, at a minimum:
 - (1) The name, trade name or logo of the Nation Gaming Operation; and
 - (2) Specific areas designated for the placement of Wagers, which betting areas shall not exceed seven (7) in number.
- (c) The following inscriptions shall appear on the blackjack Layout:
 - (1) Blackjack pays 3 to 2.
 - (2) Dealer must draw to 16 and stand on all 17's; and
 - (3) Insurance pays 2 to 1.
 - (4) Any other inscription required, in writing, by the SGA.
- (d) Each blackjack table shall have a Drop Box and a tip box attached to it with the location of said boxes on the same side of the Gaming Table, but on opposite sides of the Dealer, as approved in writing by the SGA.
- (e) A blackjack table may have attached to it, as approved in writing by the SGA, a card reader device which permits the

Dealer to read his or her hole card in order to determine if the Dealer has a blackjack. If a blackjack table has an SGA approved card reader device attached to it, the floorperson assigned to the table shall inspect the card reader device at the beginning of each gaming day. The purpose of this inspection shall be to insure that there has been no tampering with the device and that it is in proper working order.

- (f) In order to collect the cards at the conclusion of a round of play and at such other times as provided in the Compact or its Appendices, each blackjack table shall have a discard rack securely attached to the top of the Dealer's side of the table. The height of each discard rack shall equal the height of the cards, stacked one on top of the other, contained in the total number of decks that are to be used in the dealing shoe at that table. Notwithstanding the foregoing, a taller discard rack may be used if such rack has a distinct and clearly visible mark on its side to show the exact height for a stack of cards equal to the total number of cards contained in the number of decks to be used in the dealing shoe at that table. Whenever a double shoe is used at a blackjack table, the same number of decks shall be used in each side of the double shoe, and the height and marking requirements as set forth above for the table's discard rack shall be determined from the number of decks used in one side of the shoe.

74. Caribbean stud poker table; physical characteristics

- (a) Caribbean stud poker shall be played on a table having betting positions for six (6) or seven (7) players on one side of the table and a place for the Dealer on the opposite side.
- (b) The Layout for a caribbean stud poker table shall be approved in writing by the SGA and the SGO and shall contain, at a minimum:
 - (1) The name, trade name or logo of the Nation Gaming Operation;
 - (2) A separate designated betting area at each betting position for the placement of "ante" Wagers; and
 - (3) A separate designated betting area located immediately behind each ante betting area for the placement of "bet" Wagers.
- (c) Each caribbean stud poker table shall have a Drop Box and a tip box attached to it on the same side of the table as, but on opposite sides of the Dealer, in locations approved in writing by the SGA and the SGO.
- (d) Each caribbean stud poker table shall have for each betting position a separate acceptor device for the placement of a progressive Wager mounted directly in front of the respective "ante" betting area. Each acceptor device shall have a light which shall illuminate upon insertion and acceptance of a gaming Chip into such acceptor device.
- (e) Each caribbean stud poker table shall have a table controller

panel located in an area of the table as approved in writing by the SGA. The table controller panel shall be equipped with a "lock-out" button which, once activated by the Dealer, will prevent any player from depositing a gaming Chip into the acceptor device.

- (f) Each caribbean stud poker table shall be equipped with a mechanical, electrical or electronic table inventory return device which shall permit all gaming Chips deposited into the acceptor devices referenced in subdivision (d) above to be collected and immediately returned to a designated area within the table inventory container prior to the dealing of a hand. The table inventory return device shall be designed and constructed to contain any feature the SGA may require, in writing, to maintain the security and integrity of the game. The procedures for the operation of all functions of the table inventory return device shall be submitted to and approved, in writing, by the SGA, with a copy to the SGO.

75. Craps tables; physical characteristics

- (a) Craps shall be played on an oblong table with rounded corners and high walled sides, and shall be at least twelve (12) feet in length, and shall not be larger than fourteen (14) feet in length.
- (b) The Layout for a craps table shall be approved in writing by the SGA and the SGO and shall contain, at a minimum:
 - (1) The name, trade name or logo of the Nation Gaming Operation;
 - (2) Specific areas designated for the placement of Wagers; and
 - (c) The words "No call bets".
- (c) Each craps table shall have a Drop Box and tip box attached to it on the same side of the Gaming Table as, but on opposite sides of, the Dealer, and in locations approved in writing by the SGA and the SGO.

76. Gaming Devices

- (a) Definitions. The definitions below shall apply to all provisions of this section unless otherwise noted.
- (1) Accumulated credit Payout means credit earned in a Gaming Device that is paid to a customer manually.
 - (2) Actual hold percentage means the percentage calculated by dividing the win by the drop or Cash-in.
 - (3) Bill validator (or currency acceptor) means a device that accepts and reads currency by denomination in order to accurately register customer credits at a Gaming Device.
 - (4) Cash-out ticket or Redemption Ticket means an instrument of value generated by a Gaming Device representing a monetary amount owed to a customer at a specific Gaming Device.
 - (5) Cash-in meter means the meter that displays the total amount wagered in a Gaming Device which includes Cash-in and credits played.
 - (6) Coin(s) shall include token(s).
 - (7) Count means the total funds counted for a particular game, Gaming Device, Shift, or other period approved in writing by the SGA.
- (B) Count Room means a room where the coin and Cash drop from Gaming Devices, table games or other games are transported to and counted.

- (9) Currency acceptor (also known as a bill validator), means the device that accepts and reads currency by denomination in order to accurately register customer credits at a Gaming Device.
- (10) Currency acceptor drop means Cash contained in currency acceptor Drop Boxes.
- (11) Currency acceptor Drop Box, also known as a Cash storage box, means a box attached to currency acceptors used to contain currency received by currency acceptors.
- (12) Currency acceptor Drop Box release key means the key used to release a currency acceptor Drop Box from a currency acceptor device.
- (13) Currency acceptor drop storage rack key means the key used to release a currency acceptor Drop Box from a storage rack.
- (14) Drop Box storage rack key means the key used to release a Drop Box from a storage rack.
- (15) Drop bucket means a container located in the drop cabinet (or in a secured portion of the Gaming Device) for the purpose of collecting coins, tokens, and Cash-out tickets from the Gaming Device.
- (16) Drop cabinet is the wooden or metal base of the Gaming Device which contains the Gaming Device Drop bucket.

- (17) EPROM means erasable programmable read-only memory.
- (18) Floor pars means the sum of the theoretical hold percentages of all Gaming Devices within a Gaming Device denomination weighted by the Cash-in contribution.
- (19) Game server means an electronic selection device, utilizing a random number generator.
- (20) Gaming Device shall have the meaning as provided in Appendix A Section 9.
- (21) Gaming Device analysis report means a report prepared that compares theoretical hold to actual hold by a Gaming Device on a monthly or other periodic basis approved in writing by the SGA.
- (22) Gaming Device bill-in meter means a meter included on a Gaming Device that tracks the number of bills inserted into a Gaming Device's currency acceptor.
- (23) Gaming Device Count means the total amount of coins and tokens removed from a Gaming Device Drop bucket or bag. The amount counted is entered on the Gaming Device Count Sheet and is considered the drop. Also, refers to the procedure of counting the coins and tokens or the process of verifying Gaming Device coin and token inventory.
- (24) Gaming Device Count team means personnel that perform the Count of the Gaming Device Drop.
- (25) Gaming Device Payout sheet means a list of the Gaming

Device Payouts.

- (26) Gaming Device game mix means the type and number of games in a multiple game Gaming Device.
- (27) Gaming Device monitoring system means a system used by a Nation Gaming Operation to monitor Gaming Device meter reading activity on an online basis.
- (28) Gaming Device pay table means the combinations illustrated on the face of the Gaming Device that can identify Payouts of designated credits.
- (29) Gaming Device weigh/Count and wrap means the comparison of the weighed Gaming Device Drop to counted and wrapped coin.
- (30) Hold means the relationship of win to Cash-in for Gaming Devices.
- (31) Independent gaming test laboratory is a laboratory that shall perform the functions of and has been qualified consistent with the requirements of Compact Paragraph 10.
- (32) Internal audit means individuals who perform an audit function of a Nation Gaming Operation that are independent of the Gaming Facility Department subject to such audit. Independence shall be obtained through the organizational reporting relationship as the internal audit department shall not report to management of the Nation Gaming Operation. Internal audit activities shall be conducted in a manner that permits objective evaluation of areas examined and the results of internal audits are to be

communicated to management.

- (33) Jackpot Payout means a total Payout or the portion of a Jackpot paid by Gaming Device personnel.
- (34) Jackpot Payout slip means a form on which the amount of a Jackpot paid by Gaming Device personnel is recorded.
- (35) Master Gaming Device Payout form means a document used to log all Progressive Jackpots and amounts won greater than \$1,200.
- (36) Master game program number means the game program number listed on a Gaming Device EPROM.
- (37) Meter means an electronic (soft) or mechanical (hard) apparatus in a Gaming Device.
- (38) Multi-game Gaming Device means a Gaming Device that includes more than one type of game option.
- (39) Par percentage means the percentage of each dollar wagered that the house wins (i.e., Nation Gaming Operation advantage).
- (40) Par sheet means a specification sheet for a Gaming Device that provides Gaming Device hold percentage, model number, hit frequency, number of coins that can be accepted and listing.
- (41) PIN means the personal identification number selected by player and used to access that player's account.

- (42) Primary and secondary Jackpots means promotional pools offered at certain Gaming Devices that can be won in addition to the primary prize.
- (43) Progressive Gaming Device means a Gaming Device, with a payoff indicator, in which the payoff increases as it is played. The payoff amount is accumulated, displayed on a Gaming Device and shall remain until a player receives the number(s), color(s) and/or symbol(s) that result in the progressive amount being paid or until the progressive payoff pool is transferred to another progressive payoff pool as approved in writing by the SGA.
- (44) Progressive Jackpot means a deferred Payout from a progressive Gaming Device.
- (45) Random number generator means a device that is certified to generate numbers in the absence of a pattern by an independent gaming test laboratory.
- (46) Shift means any time period designated by the Nation Gaming Operation not to exceed twenty-four (24) hours.
- (47) Soft Count means the Count of the contents in a Drop Box or currency acceptor or the process of counting the currency removed from all Gaming Devices following a currency drop.
- (48) Terminal number means a unique number assigned to identify a single Gaming Device in the Gaming Facility.
- (49) Theoretical hold means the intended hold percentage or win of an individual Gaming Device as computed by reference to

its Payout schedule and EPROM.

- (50) Theoretical hold worksheet means a worksheet provided by the manufacturer for all Gaming Devices which indicate the theoretical percentages that the Gaming Device should hold based on adequate levels of coin-in or Cash-in. The worksheet also indicates the number of coins and/or credits that may be played, the Payout schedule and other information descriptive of the particular type of Gaming Device required in writing by the SGA.

- (51) Tokens means a coin-like money substitute, in various denominations, used for gambling transactions.

- (52) Weigh Count means the value of coins as determined by a weigh scale.

- (53) Weigh scale calibration module means the device used to adjust a coin weigh scale.

- (54) Weigh scale interface means a communication device between the weigh scale used to calculate the amount of funds included in drop buckets and the computer system used to record the weigh data.

- (55) Weigh tape means the tape where weighed coin is recorded.

- (56) Wide area progressive Gaming Device means a progressive Gaming Device that makes immediate or deferred Payouts where individual Gaming Devices are linked to Gaming Devices in other operations and all the Gaming Devices affect the progressive amount. As a coin, token or currency

is inserted into a single Gaming Device, the progressive meter on all of the linked Gaming Devices increases.

- (57) 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.
 - (58) Wrap means the procedure of wrapping coins. May also refer to the total amount or value of the wrapped coins.
- (b) Design requirements.
- (1) Physical hazards. Gaming Devices' electrical and mechanical parts and design principals shall not subject a player to physical hazards.
 - (2) Power switches. Each Gaming Device shall have an on/off switch that controls electrical current. Such switch shall be located in a place readily accessible within the interior of the device and shall not be accessible from the device's exterior. The on/off positions of the switch shall be clearly labeled.
 - (3) Power surges. Each Gaming Device shall not be adversely affected, other than through resets, by surges or dips of \pm twenty (20) percent of the power supply voltage. It shall be acceptable for the equipment to reset provided no damage to the equipment or loss or corruption of data is experienced.
 - (4) Supplemental testing requirements

- a. Generally. An independent gaming test laboratory shall perform tests to determine whether outside influences affect game fairness to the player or create cheating opportunities. A Gaming Device shall be able to withstand, at a minimum, the following tests and resume play without requiring intervention:
1. Random number generator. The random number generator and random selection process shall be impervious to influences from the device's exterior, including, but not limited to, electro-magnetic interference, electro-static interference, and radio frequency interference;
 2. Electro-Magnetic Interference. Gaming Devices shall not create electronic noise that affects the integrity or fairness of neighboring Gaming Devices or associated equipment;
 3. Electro-Static Interference. Gaming Devices shall be protected against static discharges. Each Gaming Device's conductive cabinet shall be grounded in such a way that static discharge energy shall not damage or inhibit the normal operation of the electronics or other components within the Gaming Device. Gaming Devices may exhibit temporary disruption when subjected to a significant electro-static discharge greater than human body discharge, but they shall exhibit a capacity to recover and complete any interrupted play without loss or corruption of any control or data information associated with

the Gaming Device. Such tests shall be conducted with a severity level of a minimum of 27KV air discharge;

4. Radio Frequency Interference (RFI). Gaming Devices shall not divert from normal operation by the application of RFI at a frequency range from twenty-seven (27) to one thousand (1,000) MHZ with a field strength of three (3) volts per meter;
5. Magnetic Interference. Gaming Devices shall not be adversely affected by magnetic interference. Manufacturers of Gaming Devices shall supply an independent gaming test laboratory and the SGA with documentation that the Gaming Device has had magnetic interference testing against any recognized standard; and
6. Liquid Spills. Liquid spills applied to the exterior of a Gaming Device shall not affect the normal operation of the device, the integrity of the material or information stored inside the cabinet, or the safety of the players operating the equipment. If liquids are spilled into a coin acceptor or bill acceptor, the acceptor shall reject all inputs and/or generate an error condition.

b. Theoretical and actual hold percentage evaluation

1. Accurate and current theoretical hold worksheets

shall be maintained for each Gaming Device.

2. For those Gaming Devices or groups of identical Gaming Devices, other than multi-game devices which are addressed in clause (b) (4) (b) (3) below, with differences in theoretical payback percentage exceeding a four (4) percent spread between the minimum and maximum theoretical payback, an employee or department independent from the Gaming Device department shall:
 - A. On a quarterly basis, record the meters that contain the number of plays by Wager (i.e. , one coin or credit, two coins or credits, etc.);
 - B. On an annual basis, calculate the theoretical hold percentage based on the distribution of plays by Wager type;
 - C. On an annual basis, adjust the Gaming Device (s) theoretical hold percentage in the Gaming Device statistical report to reflect this revised percentage.
3. For multi-game Gaming Devices, an employee or department independent of the Gaming Device department shall:
 - A. On a weekly basis, record the total Cash-in meter;

- B. on a quarterly basis, record the Cash-in meters for each game contained in the Gaming Device;
 - C. On an annual basis, adjust the theoretical hold percentage to a weighted average based upon the ratio of Cash-in for each game.
4. The adjusted theoretical hold percentage for multi-game Gaming Devices may be combined for Gaming Devices with exactly the same game mix throughout the year.
 5. The theoretical hold percentages used in the Gaming Device analysis reports shall be within the performance standards set by the manufacturer.
 6. Records shall be maintained for each Gaming Device which indicate the dates and type of modification made and the recalculation of as theoretical hold a result of such modification.
 7. Records shall be maintained for each Gaming Device which indicate the date the Gaming Device was placed into service, the date the Gaming Device was removed from operation, the date the Gaming Device was placed back into operation, and any change in Gaming Device numbers and/or designations.

8. Each Gaming Device shall contain functioning meters which shall record coin-in or credit-in.
9. Each Gaming Device with a currency acceptor shall contain a functioning bill-in meter which records the dollar amounts or number of bills accepted by denomination.
10. Gaming Device in-meter readings shall be recorded at least weekly either immediately prior to or subsequent to a Gaming Device Drop. 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 no longer than six days and has been approved in writing by the SGA. In-meter readings shall be retained for at least five years.
11. The Gaming Facility employee who records the in-meter reading shall be independent of the hard Count team.
12. Upon receipt of the meter reading summary, the Accounting Department shall review all meter readings for reasonableness using pre-established parameters as approved in writing by the SGA.
13. Prior to final preparation of statistical reports, meter readings which do not appear reasonable shall be reviewed with Gaming Device

department employees, and exceptions documented, so that meters can be repaired or clerical errors in the recording of meter readings can be corrected.

14. A report shall be produced at least monthly reflecting month-to-date, year-to-date, and if required by the SGA, life-to-date actual hold percentage computations for individual Gaming Devices and a comparison to each Gaming Device's theoretical hold percentage.
15. Each modification of a Gaming Device's theoretical hold percentage, including progressive percentage contributions, shall result in that Gaming Device being considered a new Gaming Device in the statistical reports (i.e., various hold percentages shall not be commingled).
16. If promotional Payouts and awards are included on the Gaming Device statistical reports, they shall be reported in a manner that prevents distorting the actual hold percentages of the affected Gaming Devices.
17. A report shall be produced at least monthly reflecting year-to-date combined Gaming Device performance, by denomination. The report shall include, at a minimum, the following for each denomination:

- A. Floor par;
 - B. Combined actual hold percentage;
 - C. Percentage variance; and
 - D. Projected dollar variance (i.e., coin-in or Cash-in multiplied by the percentage variance).
18. Statistical reports shall be reviewed by both Gaming Device department management and management employees independent of the Gaming Device department on at least a monthly basis.
19. Variances between theoretical hold and actual hold exceeding a threshold approved by the SGA in writing shall be immediately reported to and investigated by the SGA, with a copy to the SGO.
20. For purposes of analyzing the variances described in clause (b) (4) (b) (19) above, the Nation Gaming Operation shall maintain floor par reports by Gaming Device type.
21. Maintenance of the computerized Gaming Device monitoring system data files shall be performed by a Gaming Facility Department independent of the Gaming Device department.
22. Updates to the computerized to Gaming Device monitoring system to reflect additions or

deletions shall be made at least weekly prior to in-meter readings and the weigh process.

23. All reports required to be maintained or created by this section shall be forwarded to the SGA within twenty-four (24) hours of creation, with a copy to the SGO.

c. EPROM standards. At least annually, procedures shall be performed to insure the integrity of a sample of Gaming Device game program EPROMs by personnel independent of the Nation Gaming Operation and approved by the SGA in writing. Such personnel shall also be independent of the Gaming Device manufacturer.

(5) Last game recall. Information on at least the last five (5) games shall be retrievable through the operation of an external key-switch, or another secure method approved by the SGA in writing.

(6) Last play information. Last play information shall provide all information required to fully reconstruct the last five (5) plays. All values shall be displayed, including the initial credits, credits bet, credits won, and credits paid. If a progressive prize is awarded, it shall be sufficient to indicate that a progressive prize was awarded and not display the value of such prize.

(c) Hardware requirements and standards. Each Gaming Device shall conform to the following physical specifications:

- (1) Player terminal identification. Each Gaming Device shall have a permanent metal identification plate which shall be mounted in a manner that does not permit its removal without leaving evidence of tampering. Such identification plate shall be permanently affixed to a location on the exterior of the cabinet by the manufacturer in a location approved in writing by the SGA and shall list, at a minimum, the following information:
 - a. The manufacturer;
 - b. A unique serial number;
 - c. The Gaming Device model number; and
 - d. The date of manufacture.

- (2) External doors, compartment requirements.
 - a. The interior of a Gaming Device shall not be accessible when all doors are closed and locked;
 - b. Doors shall be manufactured of materials suitable for allowing only authorized access to the interior of the cabinet. Doors and their associated hinges shall be capable of withstanding reasonable efforts to gain access to the interior of the Gaming Device and shall leave evidence of tampering if an illegal entry is made;
 - c. The opening between the cabinet and the door of a locked area shall be designed to resist the entry of

objects;

- d. The tower light required in paragraph (5) below shall automatically illuminate whenever a door to a Gaming Device, or doors to any devices connected to a Gaming Device which may affect the operation of that Gaming Device, are opened. This requirement may be substituted with an audible alarm and/or a common candle for devices designed in such a manner as to preclude the positioning of a top mounted light. The alarm shall be designed to activate whenever the interior of the device is accessed;
- e. All external doors on each Gaming Device shall be locked and monitored by door access sensors at all time which shall detect and report all external door openings to both the device by the way of an error message and to the Online system. A Gaming Device shall not be required to cease game play when its Drop Box door is opened, but access shall be immediately reported to the Online system and shall illuminate the device's tower light and/or activate an audible alarm;
- f. Each Gaming Device shall be designed so as to prevent the insertion of any mechanism into the Gaming Device that can disable a door open sensor when the device's door is shut without leaving evidence of tampering;
- g. The sensor system shall register a door as being open whenever the door is moved from its fully closed and locked position.

- (3) Logic door and logic area. The logic area is a locked cabinet area (with its own separately locked door), which houses electronic components that may have the potential to significantly influence the operation of the Gaming Device. There may be more than one (1) such logic area in a Gaming Device. The following electronic components shall be housed in one (1) or more logic areas:
- a. CPUs and other electronic components involved in the operation and calculation of game play (e.g., game controller electronics and components housing the game or system firmware program storage media);
 - b. Electronics involved in the operation and calculation of game result determination;
 - c. Electronics involved in the calculation of game display, and components housing display program storage medium (passive display equipment exempted); and
 - d. All flash memory devices that affect the game play function of the Gaming Device.

Notwithstanding the foregoing, communication controller electronics and components housing the communication program storage media, or the communication board for the on-line system, may be secured in an area external of the Gaming Device, if approved in writing by the SGA.

- (4) Drop Boxes. Each Gaming Device equipped to accept coins or tokens shall meet the following requirements:

- a. Each Gaming Device shall contain a separate drop bucket or Drop Box to collect and retain all coins or tokens that are diverted into the Drop Box;
 - b. A drop bucket shall be housed in a locked compartment separate from any other compartment of the Gaming Device; and
 - c. Each Gaming Device shall be equipped to monitor the Drop Box area at all times.
- (5) Tower lights. Except as provided for in subparagraph (2) (d) above, each Gaming Device shall have a light located conspicuously on its uppermost surface that automatically illuminates whenever:
- a. A player has won a prize in an amount exceeding the threshold amount for which a Redemption Ticket can be printed;
 - b. A player is entitled to credits in an amount exceeding the threshold amount of credits the device can award;
 - c. An error condition has occurred, and
 - d. The 'Call Attendant' condition has been initiated by the player.
- (6) Coin and currency compartments. Each coin and currency compartment shall be locked and keyed separately from the main cabinet area and shall be secured as follows:

- a. Access to the currency storage area shall be secured via separately keyed locks and shall be protected by sensors that indicate whenever a door is opened or closed or a currency stacker is removed.
 - b. Access to the currency storage area (s) shall be through two (2) levels of locks (the relevant outer door plus one other door or lock) before the receptacle or currency can be removed.
- (7) Electronics and wiring specifications. Each Gaming Device shall conform to the following electronics and wiring specifications:
- a. Printed circuit board. The following requirements for printed circuit board identification shall be met for each Gaming Device:
 - 1. Each printed circuit board shall be identifiable by a name or number and revision level approved in writing by the SGA;
 - 2. The top assembly revision level of the printed circuit board shall be identifiable. However, if track cuts and/or patch wires are added to the printed circuit board, then a new revision number or level shall be assigned to the assembly; and
 - 3. Manufacturers shall ensure that the circuit board assemblies used in their Gaming Devices conform functionally with the documentation and

the certified versions of those printed circuit boards that were evaluated and certified by an independent gaming test laboratory.

- b. Patch wires. All patch wires and track cuts shall be documented in accordance with the relevant service manual and/or service bulletin which shall be approved by an independent gaming test laboratory.
 - c. Hardware switches and jumper requirements. All hardware switches or jumpers shall be fully documented for evaluation and approved by an independent gaming test laboratory. Hardware switches may be installed to control aspects of the player terminal that do not affect the game function, game outcome, or the game's Payout percentages, if certified by an independent gaming test laboratory.
- (8) Display monitors. Each Gaming Device's display monitor shall conform to the following specifications:
- a. Touch screens (if applicable) shall be accurate and, once calibrated, shall maintain that accuracy for at least the manufacturer's recommended maintenance period;
 - b. A touch screen (if applicable) shall have the capability of being re-calibrated by authorized gaming employees without accessing the Gaming Device's cabinet interior other than by opening the main door; and

- c. There shall be no hidden or undocumented buttons or touch points (if applicable) anywhere on the screen, except as provided for by the game rules dictating game play.

For other types of electronic displays, the display method chosen shall accurately display the outcome to the player at all times and, if a malfunction is detected by the Gaming Device, the device shall "tilt" until cleared by an authorized gaming employee.

(d) Software requirement standards

(1) Program memory requirements

- a. Control program requirements. The control program (software that operates the Gaming Device's functions) shall ensure the integrity of all control program components during execution of said components.
- b. Program storage device validation. All program storage devices located in the executable address space of a main processor shall be validated during the following conditions:
 - 1. Any power up; and
 - 2. The first time the files are loaded for use (even if only partially loaded).
- c. RAM and program storage device(s) space that is certified by an independent gaming test laboratory to

be not critical to a Gaming Device's security (e.g. video or sound ROM) need not be validated.

- d. Comprehensive checks. Comprehensive checks of critical memory shall be made during each Gaming Device's restart (e.g., power up cycle). Gaming Device's control programs (software that operates the Gaming Device's functions) shall test for possible corruption caused by failure of the program storage medium and all critical game functions. Test methodology shall detect at least 99.99 percent of all possible failures, as certified by an independent gaming test laboratory.

(2) EPROM control standards.

- a. Procedures shall be developed and implemented, subject to written SGA approval, for the following:
 - 1. Removal of EPROMs from devices, the verification of the existence of errors as applicable, and the correction via duplication from the master game program EPROM;
 - 2. Copying one Gaming Device program to another approved program;
 - 3. Verification of duplicated EPROMs prior to being offered for play;
 - 4. Destruction, as needed, of EPROMs with electrical failures; and

5. Securing the EPROM duplicator and master game EPROMs from unrestricted access.
- b. The master game program number, par percentage, and the pay table shall be verified to the par sheet when initially received from the manufacturer.
- c. Each Gaming Device shall have its circuit boards locked and physically sealed in accordance with subdivision (p).
- d. Records which document the procedures in paragraph (d) (2) (a) shall include the following information:
 1. Date;
 2. Gaming Device number (source and destination);
 3. Manufacturer;
 4. Program number;
 5. Personnel involved;
 6. Reason for duplication;
 7. Disposition of any permanently removed EPROM;
 8. Seal numbers, if applicable; and
 9. State gaming agency approved testing lab approval numbers.

- e. EPROMs returned to Gaming Devices shall be labeled and shall include the date program number, information identical to that shown on the manufacturer's label, and initials of the individual replacing the EPROM. The enclosure housing the EPROMs and/or logic boards must be sealed in accordance with subdivision (p).

(3) Storage devices or mediums

- a. Requirements for program storage devices. All program storage devices, including ROMs, EPROMs, FLASH ROMs, DVD, CD-ROM, and any other type of program storage device shall be clearly marked with sufficient information to identify the software and revision level of the information stored in such devices.
- b. Write once read many (WORM) program storage. A Write once read many program storage used as a program storage device shall contain only the program files associated with the operation of a game.
- c. Utilizing integrity check. The control program shall utilize an integrity check that includes a secured hashing method that authenticates that the program and/or support files have not been corrupted or altered prior to use or loading.
- d. CD-ROM limitations, requirements. In the case of a CD-ROM, a re-writeable disk shall not be used and "the Session" shall be closed to prevent any further writing.

- e. Write protection. In the case of a hard disk, only a write-protected drive utilizing Small Computer Systems Interface (SCSI) architecture shall be used.

- f. Alternate storage medium. The program residing in a Gaming Device shall be contained in a storage medium which cannot be altered through the use of the circuitry or programming of the Gaming Device itself. If the program is contained in any other medium, the following requirements shall apply:
 - 1. The Gaming Device shall authenticate all critical game files including, but not limited to, executables, data, operating system files and other files which may affect the game outcome or operation, that reside on such medium. This authentication shall employ a hashing algorithm that produces a 'Message Digest' (the mathematical results/ signature of the hashing algorithm) output of at least 128 bits at minimum, as certified by an independent gaming test laboratory;

 - 2. The Message Digest(s) for all files as defined in clause (d) (3) (f) (1) above shall reside on a memory device (ROM-based or other approved medium) within the Gaming Device. Message Digests which reside on any other medium shall be encrypted, using a public/private key algorithm with a minimum of a 512 bit key, or an equivalent encryption algorithm with equal or greater security certified by an independent

gaming test laboratory and approved by the SGA in writing.

3. Each Gaming Device shall authenticate all files which affect game play, operation, or outcome against the stored Message Digest (s).
 4. In the event of a failed authentication after a game has been powered up, the Gaming Device shall immediately enter an error condition with the appropriate tower light signal and/or audible alarm, and record the details, including time and date of the error in a log. Correction of this error shall require intervention by an authorized gaming employee. The game shall display specific error information and shall not clear until either the file authenticates properly, following the authorized gaming employee's intervention, or the medium is replaced or corrected, and the device's memory is cleared, the game is restarted, and all files authenticate correctly; and
 5. The device shall be capable of displaying the 'Message Digest' of any and all files on demand through the audit mode.
- g. Flash memory devices. Flash memory devices that contain the control program may be permitted if the ability to 're-write' or 'flash' the device, while it is installed in the logic board, has been certified as physically disabled (i.e., write line cut on the logic

board) by an independent gaming test laboratory. Each use of flash memory devices shall be assessed.

- h. Software verification. The Gaming Device shall have the ability to permit an independent integrity check of the Gaming Device's software from an exterior source such as the removal and authentication by a third-party device, or by having an interface port permitting a third-party device to authenticate the media. Such an integrity check shall provide a means for field testing the software to identify and validate the program.
- (4) Non-volatile RAM requirements. The following requirements for RAM shall be maintained:
- a. Battery Back-up. A battery back-up, or an approved equivalent, shall be installed for all electronic meters and shall be capable of maintaining the accuracy of all information required for thirty (30) days after power is discontinued. The back-up device shall be secured within the locked logic area;
 - b. If the battery back-up is used as an 'off Chip' battery source, it shall re-charge itself to its full potential within twenty-four (24) hours and its shelf life shall be at least five (5) years;
 - c. Random access memory that utilizes an off-Chip back-up power source to retain its contents when the main's power is switched off shall have a detection system which provides a method for its software to interpret

and act upon a low battery condition; and

- d. Clearing non-volatile memory shall require accessing the logic area in which it is housed.

(e) Meter Standards

- (1) Credit Meter. Each credit meter shall reflect credits or Cash value. Progressives may be added to a credit meter if either:
 - a. The credit meter is maintained in the currency amount; or
 - b. The progressive meter is incremented to whole credit amounts; or
 - c. The prize in the currency amount is converted to credits upon transfer to the player's credit meter in a manner that shall not mislead the player (i.e., make an unqualified statement "wins meter amount" and then rounds down on conversion) or cause accounting imbalances.
- (2) Collect Meter. Each collect meter shall reflect the number of credits collected by a player. The number of credits collected shall be subtracted from the player's credit meter before it is added to the collect meter.
- (3) Accounting and Occurrence Meters. Each Gaming Device shall have electronic accounting meters which shall be accessible only by authorized gaming employees. Electronic meters

shall be at least eight (8) digits in length. If the meter is being used in dollars and cents, at least eight (8) digits must be used for the dollar amount. The meter shall roll over to zero (0) upon the next occurrence, any time the meter is higher than eight (8) digits and after 99,999,999 has been reached. If the meter is larger than eight (8) digits, the meter shall roll over at 99,999,999 or at an other value approved in writing by the SGA and the SGO. Occurrence meters shall be at least three (3) digits in length and shall roll over to zero upon the next occurrence, and any time the meter is higher than the maximum number of digits for that meter. Electronic meters shall comply with the following:

- a. The "Cash in" meter shall cumulatively Count the total amounts wagered during game play;
- b. The "credit out" meter shall cumulatively Count all amounts paid to the player at the end of a game;
- c. The "drop" meter shall maintain a cumulative Count of the number of coins that have been diverted into a drop bucket and the credit value of all other Cash Equivalents inserted into the Gaming Device for play;
- d. The "games-played" meter shall display the cumulative number of games played since the last RAM clear;
- e. A "cabinet door" meter shall display the number of times the front cabinet door has been opened since the last RAM clear;

- f. The "drop door" meter shall display the number of times the drop door or the bill acceptor door has been opened since the last RAM clear;
- g. The "canceled credit" meter shall reflect the cumulative amounts paid by an attendant that are in excess of the credit limit and residual credits that are collected; if applicable;
- h. The "progressive occurrence" meter shall Count and reflect the number of times each progressive meter is activated.

In addition to the required meters in this subdivision, each individual game available for play shall have at least "Credits Bet" and "Credits Won" meters represented in either credits or currency amounts.

(f) Coin, token and bill acceptor standards

- (l) Coin or token acceptor standards. If the Gaming Device uses a coin acceptor, such acceptor shall accept or reject a coin on the basis of metal composition, mass, composite makeup, or equivalent security. In addition, it shall meet the following requirements:
 - a. Coin Acceptor Security Features/Error Conditions. The coin acceptor shall be designed to prevent the use of cheating methods such as slugging (counterfeit coins) , stringing (coin pullback), the insertion of foreign objects and other manipulation;

- b. Rapidly Fed Coins. Each Gaming Device shall be capable of accepting rapidly-fed coins or piggy backed coins to eliminate cheating;
- c. Direction Detectors. Each Gaming Device shall have suitable detectors for determining the direction and the speed of coin travel in the receiver. If a coin traveling at too slow a speed or in an improper direction is detected, the Gaming Device shall enter and display an error condition for at least thirty (30) seconds or until it is cleared by an authorized gaming employee;
- d. Invalid Coins. Coins deemed invalid by the acceptor shall be rejected to the coin tray and shall not be counted as credits;
- e. Coin Acceptance Conditions. Credit meters shall only record the acceptance of coins when the Gaming Device is enabled for play. Other states, such as error conditions, including door opens, audit mode and game play, shall cause the disabling of the coin acceptor system; and
- f. Credit Meter Update on Coin Insertion. Each coin inserted shall register the actual monetary value of such coin or a number of credits on the player's credit meter for the current game or bet meter. If registered directly as credits, the conversion rate shall be clearly stated, or be easily ascertainable from the Gaming Device.

(g) Bill Acceptor standards and requirements

(1) Minimum requirements

- a. Generally. All acceptance devices shall be capable of detecting the entry of valid bills, coupons, paper tokens, or other approved Cash Equivalents, if applicable, and shall provide a method to enable the Gaming Device software to interpret and act appropriately upon both a valid and invalid input. The acceptance device shall be electronically-based and configured to ensure that it only accepts valid bills of legal tender. Bill acceptors may also accept coupons, paper tokens, or other approved Cash Equivalents and shall reject all others in a highly accurate manner. The bill input system shall be constructed in a manner that protects against vandalism, abuse, and/or fraudulent activity.

- b. General Statement. Each bill acceptor shall have a secure stacker into which all accepted bills shall be deposited. The secure stacker shall be attached to the Gaming Device in such a manner so that it cannot be easily removed by physical force and shall meet the following requirements:
 1. Each bill acceptor device shall have a 'stacker full' sensor;
 2. There shall be a separate key to access the stacker area. This key shall be separate from the main door. In addition, a separate key shall

be required to remove the bills stacker; and from the

3. A tower light and/or audible alarm shall be activated whenever there is access to the bill door or whenever the stacker has been removed.
- c. Bill Acceptor Recall. A Gaming Device that uses a bill acceptor shall retain in its memory and display the denomination of the last five (5) bills inserted.
 - d. Bill Acceptor Error Conditions. Each Gaming Device bill acceptor shall have the capability of detecting and displaying the following bill acceptor error conditions:
 1. Stacker full;
 2. Bill jams;
 3. Bill Acceptor Door Open. Where a bill acceptor door is the belly glass door, a door open signal shall be sufficient; and
 4. Stacker Door Open or Stacker Removed.
 - e. Power Failure During Bill Acceptance/Validation. If a power failure occurs during acceptance, the bill acceptor shall either properly credit the bill or return the bill to the player, notwithstanding that there may be a window of time of less than one (1) second where power may fail and credit may not be

given.

- f. Self Test. Each bill acceptor device shall perform a self test at each power up. In the event of a self test failure, the bill acceptor shall automatically disable itself (i.e., enter bill reject state) until the error state has been cleared by an authorized gaming employee.

- g. Metering of Bill Acceptor Events. Each Gaming Device that utilizes a bill acceptor device shall maintain sufficient electronic metering to report the following:
 - 1. Total monetary value of all items accepted;

 - 2. Total number of all items accepted; and

 - 3. A break down of the bills and/or Cash Equivalents accepted:
 - A. For bills, the game shall report the number of bills accepted for each bill denomination;

 - B. For Cash Equivalents, the game shall have a separate meter that reports the number of notes accepted, not including bills.

(2) Standards

- a. Bill Acceptor Requirements. A bill acceptor shall not

be adversely affected by the following:

1. electro-static discharge;
 2. power surges;
 3. radio frequency interference;
 5. electro-magnetic interference;
 6. environmental extremes;
 7. cable tampering. Interconnecting cables from the bill acceptor device to the Gaming Device shall not be exposed externally; and
 8. liquid spills. If liquids are spilled into a bill acceptor, the acceptor shall either reject all bill inputs or generate an error condition.
- b. Bill Acceptor Software Requirements. If the bill acceptor only accepts bills or Cash Equivalents in a particular direction, orientation or with a particular side facing up, there shall be sufficient instructions on the bill acceptor's artwork to clearly reveal this to the players.
- c. Credits. Credits shall only be registered when:
1. The bill or Cash Equivalent has passed the point where it is accepted and stacked; and

2. The acceptor has sent the "irrevocably stacked" message to the device.
 - d. Communications. Each bill acceptor shall communicate to the Gaming Device using a bi-directional protocol certified by an independent gaming test laboratory.
- (3) Factory Set Bill Acceptors. If bill acceptors are designed to be factory set only, it shall be impossible to access, conduct maintenance or make adjustments to those bill acceptors in the field, other than:
- a. The selection of bills, coupons, paper tokens, or other approved Cash Equivalents and their limits;
 - b. Changing certified EPROMs or downloading certified software;
 - c. The adjustment of the acceptor's tolerance level for accepting bills or Cash Equivalents of varying quality.
 - d. Maintenance, adjustment, and repair per approved factory procedures; or
 - e. Options that set the direction or orientation of acceptance.

All adjustments to a bill acceptor shall require access by an authorized gaming employee to a secured area of the Gaming Device's interior which shall not be accessible from the device's exterior. Adjustments shall only be

effectuated through the activation of a key-locked switch or a similarly secure mechanism approved in writing by the SGA.

(h) Cashless transaction system standards.

(1) Generally. A cashless transaction system means the system by which a player obtains, transfers and redeems credits. A cashless transaction system permits a player to play the Gaming Devices without inserting coins, tokens or paper currency therein, and to win prizes without receiving a Redemption Ticket from the Gaming Devices. A cashless transaction system shall include the following components:

- a. Integration with the computerized accounting system;
- b. A cashless system card; and
- c. A means of accounting for player deposits of Cash or Cash Equivalents and exchanges for and redemption of credits which are independent of the Gaming Devices, through a player's account, a voucher system, or a cashless system card.

(2) Player Accounts. A cashless transaction system shall meet, at minimum, the following requirements:

- a. Generally.
 1. All player account information shall be stored on at least two separate non-volatile media;

2. An audit file shall maintain all financial transactions against the account. Such file shall be stored in at least two separate non-volatile media, shall be accessible for purposes of audit and dispute resolution to authorized individuals and shall be available on-line for a minimum of thirty (30) days. After thirty (30) days such information shall be available off-line for a minimum of 180 days;
 3. Access controls shall be in place to eliminate unauthorized individuals from accessing account information or history;
 4. All means for communicating information within the system shall be through the use of secure communication protocols designed to prevent unauthorized access or tampering which shall employ Data Encryption Standards or equivalent encryption with changeable seeds or algorithms; and
 5. Any cashless system card issued to a player for the purpose of using the cashless transaction system shall bear on its face a control or inventory number unique to that instrument.
- b. Establishment of player accounts. A cashless system player account shall only be established upon presentation of positive form of identification bearing the photograph of the presenting patron.

1. A computer file for each player shall be prepared prior to the player being issued a cashless system card. Each patron shall select his/her Personal Identification Number (PIN), known only to that patron, to be used in conjunction with the cashless system card; and
 2. An authorized gaming employee shall sign-on with a unique password to a terminal equipped with peripherals required to input data from the player cashless system player account form; and
 3. The cashless transaction system shall be designed to ensure that after entering a specified number of incorrect PIN entries at either a cage or player terminal, the patron shall be required to obtain a new PIN.
- c. Depositing in player accounts. To deposit into a cashless system player account:
1. A cashier shall sign-on with a unique password to a cashier terminal equipped with peripherals required to complete the credit transactions;
 2. The player shall present Cash, Chips, coin, coupons or Cash Equivalents along with their cashless system card to a cashier to deposit credits;
 3. The cashier shall complete the transaction by utilizing a cashless system card scanner or

other device approved in writing by the SGA;

4. The cashier shall accept the funds from the player and enter the appropriate amount on the cashier terminal;
 5. A multi-part deposit slip comprised of at least two parts shall be generated by the point of sale receipt printer. The cashier shall direct the player to sign the original and copy (copies) of the deposit slip receipt. The original of the signed deposit slip shall be given to the patron; the copy (copies) of the signed deposit slip shall be secured in the cashier's Cash drawer. The first copy of the signed deposit slip shall be forwarded to the Accounting Department at the end of the gaming day, and additional copies, if any, shall be disseminated in accordance with the Nation Gaming Operation's approved System of Internal Controls; and
 6. The cashier shall verify the player's balance before completing the transaction, secure the funds in their Cash drawer and return the cashless system card to the player.
- d. Withdrawal from player accounts. The player shall present his or her cashless system card to a cashier to withdraw credits. The cashier shall perform the following:

1. Scan the cashless system card;
2. Direct the player to enter his or her PIN;
3. The cashier shall ascertain the amount the player wishes to withdraw and enter that amount into the cashier computer;
4. A multi-part withdrawal slip comprised of at least two parts shall be generated by the point of sale receipt printer. The cashier shall direct the patron to sign the original and copy (copies) of the withdrawal slip;
5. The cashier shall verify that the cashless system card and the player match by:
 - A. Comparing the player to the image reflected on the computer screen of player's Photographic Identification; and
 - B. Comparing the player's signature on the withdrawal slip to the signature reflected on the computer screen.
6. The cashier shall verify the player's balance before completing the transaction. The cashier shall pay the player the appropriate amount, issue the player the original withdrawal slip and return the cashless system card to the player;

7. The copy (copies) 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 additional copies, if any, shall be disseminated in accordance with the Nation Gaming Operation's approved System of Internal controls; and
8. In the event the imaging function is temporarily disabled, a player shall be required to provide two forms of positive identification for a Cash withdrawal transaction at a cashier station.

- (3) Cashless system card. Any cashless system card which the Nation Gaming Operation intends to implement as part of the cashless transaction system shall be tested by an independent gaming test laboratory to ensure the integrity of player funds. Any cashless system card must store on the card or on the system using the card an audit trail of the last ten (10) transactions involving the use of the card. Each transaction record shall include, at a minimum, the type of transaction, the amount of the transaction, the date of the transaction, the time of the transaction, the identity of the gaming employee, and the identification of the Gaming Device, cashier terminal or other point of Cash exchange where the transaction occurred. The minimum daily and monthly reporting for cashless system card activity shall include at a minimum:

- a. Total amount of Cash transferred to the cashless system, card;
- b. Total amount of cashless system card funds transferred to Cash;
- c. Total amount of cashless system card funds transferred to credits;
- d. Total number of credits transferred to cashless system card amounts;
and
- e. Total amount of the unredeemed cashless system card balance.

(i) Ticket printer standards

(1) Payment by ticket printer. If the Gaming Device utilizes a printer to make payments, the printer shall print on a ticket and provide the same data to an on-line electronic game management system the following information regarding each Payout ticket printed which can be obtained from the Gaming Device, an interface board, the on-line system, or another means approved in writing by the SGA:

- a. Value of credits in local monetary units in numerical form;
- b. Time of day the ticket was printed in twenty-four (24) hour format reflecting hours and minutes;
- c. Date, in any recognized format, indicating the day,

month, and year;

- d. Gaming Device number; and
- e. Unique validation number, or barcode.

The Gaming Device shall either keep a duplicate copy of the ticket or print and issue a copy to the player, provided the device has the ability to retain the information pertaining to the last thirty-five (35) games to resolve player disputes. In addition, an approved system shall be used to validate the Payout ticket, and the ticket information recorded by the Online system shall be retained for at least as long as the ticket is valid at that location, or as otherwise required by the SGA.

- (2) Printer location. If a Gaming Device is equipped with a printer, it shall be located in a key-locked area of the Gaming Device requiring the opening of the main door to access it but not in the logic area or the Drop Box area.
- (3) Printer error corrections. A printer shall be capable of detecting and acting on the following conditions, all of which shall initiate an error condition:
 - a. Out of paper/paper low;
 - b. Printer jam/failure; and
 - c. Printer disconnected, which may only be detected when the software attempts to print.

(4) Redemption Ticket Validation. Payment by ticket printer as a method of credit redemption shall be permissible only when the Gaming Device is linked to a computerized system that permits validation of the printed ticket. Validation approval or related information shall be generated by the central system in order to validate tickets. Tickets may be validated only at locations approved by the SGA in writing. The validation system shall be capable of detecting attempts to defraud the system by redeeming a ticket issued previously by the Gaming Device and shall be designed and constructed to provide an alternate method of redeeming winning tickets if communication between the Gaming Device and the validation system is interrupted.

(j) Error corrections

(1) Generally. Each Gaming Device shall be capable of detecting and displaying the following error conditions and illuminating the tower light and/or sounding an audible alarm. Error conditions shall be cleared either by an authorized gaming employee or upon initiation of a new play sequence:

- a. Coin-in jam;
- b. RAM error;
- c. Low RAM battery (for batteries external to the RAM itself) or low power source;
- d. Currency-in jam;

- e. Program error or authentication mismatch;
- f. Door open (including bill acceptor);
- g. Reverse coin-in (coin traveling wrong way through acceptor) ; and
- h. Power Reset.

For games that use error codes, a description of Gaming Device error codes and their meanings shall be affixed in an approved area of the Gaming Device's interior. Video-based games that do not use error codes shall display meaningful text as to the error conditions.

- (2) Door open procedures. When the Gaming Device's main door is opened, the game shall cease play, enter an error condition, display an appropriate error message, disable coin acceptance and bill acceptance, and either sound an alarm or illuminate the tower light or both.
- (3) Door close procedures. When a Gaming Device's main door is closed, the game shall automatically return to its original state and display an appropriate error message, until the next game has ended.
- (4) Program interruption. After a program interruption (e.g., power down) , the software shall be capable of recovering to the state it was in immediately prior to the interruption occurring.
- (5) Program resumption. On program resumption, the following

procedures shall be performed as a minimum requirement:

- a. No communication to an external device shall commence until the program resumption routine, including self-testing, is completed successfully;
- b. Gaming Device control programs shall test themselves for possible corruption due to failure of the program storage media. The authentication may use the checksum; however, it is preferred that the Cyclic Redundancy Check (CRC) calculations be used as a minimum (at least 16 bit). Other test methodologies shall be of a type certified by an independent gaming test laboratory; and
- c. The integrity of all critical memory shall be checked.

(k) Credit redemption

- (1) Generally. Available credits may be collected from the Gaming Device by the player pressing the "COLLECT" button at any time other than when:
 - a. A game is being played;
 - b. The device is in audit mode;
 - c. Any door is open;
 - d. The device is in test mode;
 - e. A Credit Meter or Win Meter incrementation is in

progress, unless the entire amount is recorded on the meters when the collect button is pressed; or

- f. There is an error condition.
-
- (2) Cancel Credit. If credits are collected, and the total credit value is greater than or equal to a specific limit (e.g., Printer Limit for printer games), the game shall be disabled until the credits have been paid, and the handpay is cleared by an authorized gaming employee.
 - (3) Taxation reporting. The Gaming Device shall enter a lock up condition if a win creates a manual handpay that is required by a taxing jurisdiction.
-
- (l) Test, diagnostic mode. If in a test mode, any test that incorporates credits entering or leaving the Gaming Device shall be completed on resumption of normal operation. In addition, there shall not be any test mode that increments any of the Gaming Devices.
-
- (1) Contents of critical memory. Critical memory shall store all data that is vital to the continued operation of the Gaming Device; which shall include, but not be limited to:
 - a. All electronic meters required in the Gaming Device including last bill data, power up and door open metering;
 - b. Current credits;
 - c. Gaming Device/game configuration data;

- d. Information pertaining to the last five (5) plays including the random number generator outcome (including the current game, if incomplete); and
 - e. Software state (the last normal state the Gaming Device software was in before interruption).
- (2) Entry to test or diagnostic mode. The main cabinet door of the Gaming Device may automatically place the Gaming Device in a service or test-mode. Test/diagnostics mode may also be entered, via an appropriate instruction, by an authorized gaming employee during an audit mode access.
 - (3) Exiting from test or diagnostic mode. When exiting from test mode, the game shall return to the state it was in immediately prior to entering the test mode.
 - (4) Test games. When a Gaming Device is in a game test mode, it shall clearly indicate that it is in a test mode, not normal play.
 - (5) Function of RAM reset.
- (m) Computerized system accounting system. A computerized accounting shall be required to perform reporting and other functions in support of the Gaming Devices. The computerized accounting system shall not interfere with the outcome of any gaming functions. The following reporting capabilities shall be provided by the computerized accounting system:
- (1) Gaming Device revenue report. A revenue report for each Gaming Device bank shall be generated and maintained on a

confidential and secure basis which on at least a daily and monthly basis accounts for:

- a. The total amount won per prize level for each game; and
 - b. The amount wagered per game type.
- (2) Electronic keno game reports. An electronic keno game report shall be made and maintained on a confidential and secure basis which, on at least a daily and monthly basis, accounts for each electronic keno game, the following information:
- a. Total sales;
 - b. Total won per prize level; and
 - c. Total won per Gaming Device.
- (3) Progressive report. A Progressive Jackpot report shall be generated which provides at a minimum for both the specified accounting period and from the introduction of the Progressive Jackpot to date the:
- a. Amount seeded;
 - b. Amount in reserve fund;
 - c. Current Progressive Jackpot;
 - d. Contribution total;

- e. Total paid in prizes;
 - f. Itemized Progressive Jackpot awards; and
 - g. Amount, time of award, and the Gaming Device on which the Progressive Jackpot was won.
- (4) Liability report. A liability report shall be required, at a minimum of on a daily and monthly basis providing a summary the outstanding funds carried from business day to business day including, at a minimum, the following:
- a. Amount of prizes which were awarded, but have not yet been claimed;
 - b. Detail of prizes for which the redemption period expired during the specified reporting period;
 - c. Unredeemed credits; and
 - d. Expired credits.
- (5) Master reconciliation report. A master reconciliation report shall be available, at a minimum, on a daily and monthly basis, providing a summary of all daily sources of funds and disposition of funds, including but not limited to the following:
- a. Funds collected from cashiers and Cash exchange kiosks;
 - b. Funds carried forward from the prior business day,

including liability from prizes awarded, but not paid out, prize pool balances, and reserve funds;

- c. Payments to players;
- d. Funds available to the Nation Gaming Operation; and
- e. Tickets and prizes dispensed and played, which reconcile with the amount won.

(6) Data Retention Requirements. Data necessary to audit compliance with the standards set forth in this section shall be maintained for a minimum of two years, and in connection with determining randomness where applicable, for a minimum of six months. To an extent not inconsistent with the foregoing, data shall be retained and backed up by the computerized accounting system according to the following minimum requirements:

- a. Accounting records;
- b. Per Gaming Device bank, cashier terminal, or other points of Cash exchange (daily records) and meters (on-line for six months);
- c. Daily records and meters (off-line for twelve months);
- d. Deal records, for each bank of Gaming Devices;
- e. The amount wagered and the amount won, daily by prize level, on line (for at least six months);

- f. The amount wagered and the amount won, daily by prize level, off line (for at least six months);
 - g. On-line prize redemptions (for at least thirty days);
 - h. Dated Cash vouchers (for at least thirty days); and
 - i. Undated bearer instruments (indefinitely or until instrument by its own terms expires).
- (n) Progressive elements in Gaming Devices. Each progressive system shall meet the game standards set forth in this section which shall apply to each progressive Gaming Device linked to a Progressive Controller.
- (1) A progressive Gaming Device means a Gaming Device that has an increasing Jackpot prize based on a function of credits that are bet. However, the progressive element shall not be considered to include games that incorporate a bonus feature as part of the game theme which offers awards that increase as the game is played.
 - (2) Progressive display requirements.
 - a. Generally. Five or more progressive Gaming Device(s) shall be linked directly or indirectly, to a mechanical, electrical, or electronic progressive meter, including a video display, if applicable, that reflects a payoff which increments at a set rate of progression as credits are wagered. A progressive meter shall be visible to all players who are playing a device which may potentially win the Progressive

Jackpot prize amount if the pre-designated Progressive Jackpot combination appears. The above parameters shall be verified on-site prior to commencement of gaming activities by an independent gaming test laboratory. Each progressive meter shall display the current total of the Progressive Jackpot in monetary value or credits.

- b. Types of Updating Displays. The use of odometer and other "paced" updating displays may be utilized. Each Progressive Jackpot meter shall display the winning Jackpot prize value within thirty (30) seconds of the winning Jackpot combination being recognized by the central system. When paced updating displays are utilized, the system Jackpot meter shall display the winning value after the Jackpot broadcast is received from the central system.

(3) Progressive Controller standards and requirements

- a. Progressive Controller Description. A Progressive Controller shall mean all of the hardware and software that controls all communications among the devices that calculate the values of the Progressive Jackpot prize(s) and displays such information within a progressive Gaming Device link and on the associated Progressive Jackpot meter.
- b. Progressive Controller Program Interruption. After a program interruption (e.g. power down), the software shall be capable of recovering to the state it was in immediately prior to the program interruption.

- c. Progressive Resumption. Upon program resumption, the following procedures shall, at a minimum, be performed:
1. No communication to an external device shall commence until the program resumption routine, including self-testing, is completed successfully;
 2. Progressive System control programs shall test themselves for possible corruption due to failure of the program storage media. The authentication may use the checksum; however, it is preferred that the Cyclic Redundancy Check calculations be used as a minimum (at least 16 bit); and
 3. The integrity of all critical memory shall be checked.
- d. Access to the Progressive Controller. Each Progressive Controller used with progressive Gaming Devices shall be housed in a secure environment allowing only authorized accessibility. Access to the Progressive Controller shall be in conformance with internal control standards approved in writing by the SGA.
- e. Progressive Controller Required Meters. The Progressive Controller or other approved progressive system component shall maintain the following information in non-volatile memory utilizing meters

certified by an independent gaming test laboratory at least 99.99% accurate, which shall display on command.

1. The number of Progressive Jackpot prizes won on each progressive level if the Progressive Jackpot display has more than one (1) winning amount;
 2. The cumulative amounts paid on each progressive level if the progressive display has more than one (1) winning amount;
 3. The maximum amount of the Progressive Jackpot Payout for each level displayed;
 4. The minimum amount of the Progressive Jackpot Payout for each level displayed; and
 5. The rate of progression for each level displayed.
- f. Progressive Controller Error Conditions. When a Progressive Controller error occurs, the displays shall alternate between the current amount and an appropriate error message that is visible to all players, or which alerts the Nation Gaming Operation to the error condition. If the following events occur, the game utilizing the progressive feature shall be disabled, and an error shall be displayed on the Progressive Jackpot meter, another approved progressive system component or the Gaming Device:

1. During a communication failure;
2. When there have been multiple communication errors;
3. When a controller checksum or signature has failed;
4. When a controller's RAM or program storage device mismatch or failure occurs;
5. When the Progressive Jackpot configuration is lost or is not set;
6. If there has been an unreasonable amount of credits bet, defined by the progressive systems set up, which is based on the number of bets and the number of Gaming Devices; or
7. If, when the Gaming Device's game meters are validated against the Progressive Controller's meters (via communications between the game board and controller) they do not reconcile.

(4) Progressive Jackpot prize standards and requirements

- a. Setting the Progressive Jackpot prize amounts. The method by which system Jackpot parameter values are modified or entered shall be secure. All progressive Gaming Devices and/or any approved progressive system component shall display, upon request, the following

information for each Progressive Jackpot prize offered (if applicable) :

1. Current value (the current Progressive Jackpot prize amount);
2. Overflow (the amount exceeding a predetermined limit);
3. Hits (the number of times a Progressive Jackpot prize has been won);
4. Wins (the total value of Progressive Jackpot prizes awarded or a history of the last 25 Progressive Jackpot prize hits);
5. Base (the starting value of the Progressive Jackpot prize) ;
6. Increment (the SGA approved percentage increment rate for each credit or monetary unit bet);
7. Secondary increment (the percentage increment rate after an approved limit has been reached);
8. Hidden increment (the percentage increment rate for the reserve pool. The next base amount shall be computed or posted to advise the player of this contribution);
9. Reset value (the amount the Progressive Jackpot meter resets to after the Progressive Jackpot

prize is awarded); and

10. The number of Gaming Devices enrolled in the progressive link.
- b. Communications for signaling a Jackpot. There shall be a secure, two-way communication protocol between the main game processor Board and the progressive system. In addition, the progressive system shall be capable of:
 1. Sending to each Gaming Device the amount that was won for metering purposes; and
 2. Constantly updating the Progressive Jackpot prize display(s) as play on the link is continued.
 - c. Controller and display functions during Progressive Jackpot win. When a winning Progressive Jackpot prize is recorded on a Gaming Device the Progressive Controller shall permit the following to occur on the device and/or Progressive Jackpot prize display:
 1. Display of the winning Jackpot prize amount;
 2. Display of the Gaming Device identification that caused the Progressive Jackpot meter to activate;
 3. The Progressive Controller shall automatically reset to the SGA approved reset amount and

continue normal play; and

4. Display the new Progressive Jackpot prize value(s) currently on the link.

- d. Swapping progressive levels. For progressive games offering multiple levels of prize awards, the player shall always be paid the higher progressive amount, if a particular winning combination appears that warrants that higher paying award. This may occur when a winning combination is determined to qualify for more than one of the available payable combinations (such as a Flush may also be a form of a Straight Flush, and a Straight Flush may be a form of a Royal Flush). When a player is awarded the lower prize under such a condition the progressive levels shall be swapped to ensure that the player is awarded the highest possible Progressive Jackpot prize value he or she is entitled to.
- e. Gaming Device requirements when any Progressive Jackpot prize is awarded. When a Progressive Jackpot prize has been awarded, the Gaming Device or other approved progressive component shall perform the following:
 - 1. A message identifying the prize awarded shall be displayed;
 - 2. Unless the prize is transferred to the player's credit meter the software and game shall become disabled until the award has been paid by an

authorized gaming employee; and

3. All Progressive Jackpot-related meters shall be updated.
- f. Progressive Jackpot Gaming Device metering requirements. Each Gaming Device shall continuously update its electronic meters to reflect the winning Progressive Jackpot prize amount(s). Progressive Jackpot wins may be added to the credit meter if:
1. The credit meter is maintained in either monetary value or credits;
 2. The Progressive Jackpot meter is incremented only in whole credit amounts; or
 3. The Progressive Jackpot prize, in monetary value, is converted to credits upon transfer to the player's credit meter in a manner that shall not mislead the player. The conversion from monetary value to credits shall always round up.
- (5) Miscellaneous Progressive Jackpot game requirements and standards
- a. Monitoring of credits bet. During the "Normal Mode" of progressive Gaming Devices, the Progressive Controller shall continuously monitor each Gaming Device enrolled in the link for credits bet and shall multiply that total by the approved rate of progression and denomination in order to determine the

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- c. The Count team members may be permitted access to the release keys by an SGA Inspector during the Count, but only in order to reset the Drop Boxes when necessary.
- d. Employees authorized to remove the currency acceptor Drop Boxes shall be precluded from having access to Drop Box contents keys.
- e. A Gaming Facility employee independent of the Gaming Device department shall be required to accompany currency acceptor Drop Box storage rack keys and shall observe each time Drop Boxes are removed from or placed in storage racks. The Surveillance Department shall be notified prior to the issuance of such keys and prior to the removal of any Drop Box.
- f. Employees authorized to obtain Drop Box storage rack keys shall be precluded from having access to Drop Box contents keys with the exception of the Count team members during a Count.
- g. Access to the currency acceptor contents key at other than scheduled Count times shall require the involvement of at least three employees, at least one of whom shall be an employee of the SGA. The reason for access shall be documented on the approved key control log with the printed names, signatures and gaming license numbers of each of the participants and observers. Only the Count team members shall be allowed access to Drop Box contents.
- h. At least three Count team members, one of whom shall

be an employee of the SGA, shall be required to be present at the time currency acceptor Count Room keys and other Count keys are issued for the Count.

- i. Duplicate keys shall be maintained by the SGA in accordance with the approved System of Internal Controls to ensure the same degree of control over duplicate Drop Box keys as is required for the original keys. Key duplication and destruction logs shall be maintained and provided to the SGA for each key duplicated which indicate the number of keys made and destroyed.

(2) Drop Box doors.

- a. The physical custody of the keys needed to access Gaming Device coin drop cabinets, including duplicates, shall be maintained by the SGA. Access to such keys shall require the involvement of two persons, one of whom shall be an employee of the SGA.
- b. Two employees, one of whom shall be an employee of the SGA, shall be required to observe each time Gaming Device Drop cabinets are accessed. The Surveillance Department shall be notified prior to the issuance of such keys and prior to accessing any coin drop cabinet.

(3) External doors. External door keys, the number of which shall be determined by the SGA, shall be permitted to be held and utilized only by those Gaming Facility employees whose job responsibilities require their access to non-

secure internal compartments of the Gaming Device in accordance with subparagraph (r) (2) (i) below. Duplicate keys to external doors shall be maintained on premises by the SGA only in accordance with the approved System of Internal Controls.

(4) Logic doors.

- a. The interior logic cage compartment of each Gaming Device shall each be secured by a key unlike any other access key for any Gaming Device or associated equipment. Each registered Manufacturer or Distributor shall provide to the SGA the original key and a duplicate needed to access the interior logic cage compartment for each Gaming Device.
- b. The physical custody of the keys needed to access Gaming Device logic doors, including duplicates, shall be maintained by the SGA. Access to such keys shall require the involvement of two persons, one of whom shall be an employee of the SGA. A log must be kept detailing each use of such key.
- c. Two employees, one of whom shall be an employee of the SGA, shall be required to observe each time Gaming Device logic doors are accessed. The Surveillance Department shall be notified prior to the issuance of such keys and prior to the opening of any logic door.

(p) Security seal standards and requirements. The SGA shall seal the following components and secure areas with prenumbered security seals. The security seals, which shall be in a format

approved in writing by the SGA, shall be designed, constructed and installed to preclude their removal from, and prevent access to, such components and secured areas without tearing or otherwise illustrating evidence of tampering:

- (1) Logic doors and/or logic areas;
 - (2) Logic boards;
 - (3) EPROM's; and
 - (4) Any other component or secure area identified in writing by the SGA.
- (q) Gaming Device accounting/auditing procedures standards.
- (1) Gaming Device accounting/auditing procedures shall in accordance with the approved System of Internal Controls and shall be performed by Gaming Facility employees who are independent of, and have no incompatible function with, the transactions under review.
 - (2) Computerized player tracking systems. An authorized Accounting Department employee shall perform the following procedures at least one day per month:
 - a. Foot all Jackpot and fill slips and trace such totals to those produced by the central monitoring system;
 - b. Review all slips written (from the restricted copy) for continuous sequencing;

- c. Foot all points-redeemed documentation and trace them to the central monitoring system-generated totals; and
 - d. Review all points-redeemed documentation for propriety.
- (3) Computerized Gaming Device monitoring systems. Procedures shall be performed at least monthly to verify that the computerized system is transmitting and receiving data from the Gaming Devices properly and to verify the continuing accuracy of the coin-in and Cash-in meter readings as recorded in the Gaming Device statistical report.
- (4) Weigh scale interface systems. For at least one drop period per month authorized Accounting Department employees shall compare the weigh tape to the system-generated weigh, as recorded in the Gaming Device statistical report, in total. Discrepancies shall be immediately reported to the SGA, with a copy to the SGO, and shall be resolved prior to the generation/distribution of Gaming Device reports.
- (5) For each drop period, Accounting Department personnel shall compare the "coin-to-drop" meter reading to the actual drop amount. Discrepancies shall be immediately reported to the SGA, with a copy to the SGO, and shall be resolved prior to generation/distribution of Gaming Device statistical reports.
- (6) Follow-up shall be performed for any one Gaming Device having an unresolved variance between actual drop and coin-to-drop meter reading in excess of three (3) percent. The follow-up performed and results of the investigation shall

be documented, maintained and reported to the SGA, with a copy to the SGO.

- (7) At least weekly, authorized Accounting Department employees shall compare the bill-in meter reading to the total currency acceptor drop amount for the week. Discrepancies shall be immediately reported to the SGA, with a copy to the SGO, and shall be resolved prior to the generation/distribution of Gaming Device statistical reports.
- (8) Follow-up shall be performed for any Gaming Device having an unresolved variance between actual drop and bill-in meter reading in excess of three (3) percent. The follow-up performed and results of the investigation shall be documented, maintained and reported to the SGA, with a copy to the SGO.
- (9) At least annually, authorized Accounting Department personnel, accompanied by SGA personnel, shall randomly verify that EPROM changes are properly reflected in the Gaming Device analysis reports.
- (10) Authorized Accounting Department employees shall review exception reports for all computerized Gaming Device systems On a Daily Basis for propriety of transactions and unusual occurrences.
- (11) All Gaming Device auditing procedures and any follow-up performed shall be documented and maintained for inspection by the SGA.

(12) Nation gaming agency personnel, State gaming agency personnel, or their designees, shall have the authority to participate in or assist in the conduct of any audit conducted pursuant to the procedures established in this subsection.

(r) Miscellaneous requirements

(1) Gaming Device movement, storage and removal standards.

a. The Nation Gaming Operation shall provide a floor plan to the SGA indicating the precise initial location of each Gaming Device. The initial floor plan shall contain, at the minimum, the following information for each device:

1. Location identification.
2. If patron stool is present.
3. If bill acceptor is present.
4. Device denomination.
5. Manufacturer.
6. Device model number.
7. Serial number of devices.
8. SGA seal number, as applicable.

9. EPROM Chip number.
 10. Theoretical hold percentage.
 11. Type of device and description.
 12. Device designated number.
- b. Prior to relocating, adding or removing any Gaming Device from its initial location the Nation Gaming Operation shall request and obtain the written approval from the SGA. Such requests shall be in writing and shall be requested no less than seventy-two (72) hours prior to the requested date of relocation, addition, or removal of a Gaming Device. Such requests shall include at the minimum:
1. A computer generated inventory listing each Gaming Device, its present location and its proposed location. Any request to add a Gaming Device shall be accompanied by a listing of the information required in subparagraph (a) (1) through (a) (12), above.
 2. Any written request shall be authored by the Nation Gaming Operation employee directly responsible for Gaming Device(s) or his/her designee and shall include:
 - A. The date of request.
 - B. The proposed date of relocation, addition,

or removal.

- C. A written certification that all Nation and/or State safety and egress codes are adhered to.
 - D. A written certification from the surveillance director or his/her designee that adequate closed circuit television coverage of each Gaming Device is present.
 - E. An updated floor plan, displaying all Gaming Device locations, each device Location Number, surveillance camera locations, and patron gaming stool locations.
- c. When any Gaming Device is temporarily removed from the floor, Gaming Device Drop contents shall be protected in accordance with the approved System of Internal Controls to preclude the misappropriation of stored funds.
 - d. When a Gaming Device is permanently removed from the gaming floor, the Gaming Device Drop contents shall be counted and recorded by at least two employees, one of whom shall be a SGA employee, with appropriate documentation being routed to the Accounting Department for proper recording and accounting.
 - e. Prior to the removal of any Gaming Device from the Gaming Facility, prior written approval shall be

obtained from the SGA in writing. Documentation providing the following shall be included for each removed device:

1. Manufacturer.
2. Device model number.
3. Serial number of device.
4. SGA's seal number, as applicable.
5. EPROM Chip number.

Additionally, the copies of all bills of lading for the shipment of Gaming Devices shall be filed with the SGA, with a copy to the SGO.

(2) Maintenance, repair and servicing of Gaming Devices.

- a. The Nation Gaming Operation shall not alter the operation of approved Gaming Devices or associated equipment and shall ensure that the Gaming Devices and associated equipment are maintained in proper working condition.
- b. Only the following persons may service or repair a Gaming Device or associated equipment:
 1. A duly licensed Manufacturer;
 2. A licensed employee of a licensed Manufacturer;

3. A technician certified by a licensed Manufacturer and employed by a licensed Distributor; or
 4. A technician employed by the Nation Gaming Operation who has completed a training course approved in writing by the SGA regarding the service and/or repair of Gaming Devices or associated equipment.
- c. Each licensed Manufacturer must maintain a certification program for the purpose of training and certifying technicians to service and repair Gaming Devices manufactured by that licensed Manufacturer. Upon request, the licensed Manufacturer shall provide evidence of such program to the SGA, including a full description of the program, models of Gaming Devices for which training is provided, criteria for certification, information concerning instructor qualifications, and copies of training materials and tests. Any program deemed insufficient by the SGA shall be modified at the SGA's request.
 - d. Each licensed Manufacturer shall ensure that its technician employees have received sufficient and appropriate training in the service and repair of each of its approved Gaming Device models before the Gaming Device may be placed in operation in the Gaming Facility.
 - e. Each licensed Manufacturer that certifies other persons as technicians shall ensure that such

technicians have received sufficient and appropriate training in the service and repair of the approved Gaming Device(s) to be operated by the Nation Gaming Operation, or to be distributed by a licensed Distributor employing the technician. Such training shall meet the requirements of paragraph (c) above.

- f. Upon request of the SGA, a certified technician, or a licensed Manufacturer, or Distributor employing the technician, shall provide proof satisfactory to the SGA of the technician's certification, in accordance with paragraph (c) above.
- g. The Nation Gaming Operation shall ensure that all service and repairs on its Gaming Devices, including the installation or repairs of component parts such as bill acceptors, monitoring systems, or other parts that may alter the current or subsequent operation of a Gaming Device, are made correctly and in compliance with these standards and any additional SGA requirements.
- h. Except for certified technicians, as defined herein, no employee of the Nation Gaming Operation or any other person may perform service on or repair any Gaming Device or associated equipment other than incidental repairs which cannot affect any of the devices' major systems or require that the person performing the service or making the repair access any internal space within a Gaming Device or any of its associated equipment.

1. The exterior door keys shall be issued, on a per Shift basis, only to personnel qualified under subparagraph (b) with maintaining the devices. When exterior door keys are not in use they shall be maintained in a locked box designed for the purpose of securing the keys, the key to which shall be controlled and maintained by the SGA.

- j. The Nation Gaming Operation shall maintain a written maintenance log inside the main cabinet access area of each Gaming Device. Every person who gains entry into any internal space of a Gaming Device must sign the maintenance log, record their gaming employee license or registration number, indicate the date and time of entry, indicate any mechanical meter readings, and list all areas inspected, repaired or serviced. The Nation Gaming Operation shall retain the maintenance log for a period of five years and shall make the maintenance log immediately available to the SGA or its authorized agents upon request.

- k. The Nation Gaming Operation shall notify the SGA and the Security Department prior to gaining entry into any Gaming Device, or accessing the area in which the network controller computers are located. Nation Gaming Operation employees accessing the area in which the network controller computers are located shall be accompanied at all times by personnel from the Security Department and personnel or Inspectors of the SGA.

77. Let it ride poker table; physical characteristics

- (a) Let it ride poker shall be played on a table having betting positions for seven (7) players on one side of the table and a place for the Dealer on the opposite side.
- (b) The Layout for a let it ride poker table shall be approved in writing by the SGA and the SGO and shall contain, at a minimum:
 - (1) The name, trade name or logo of the Nation Gaming Operation;
 - (2) Three (3) separate designated betting areas at each betting position for the placement of Wagers;
 - (3) A separate designated area at each betting position for the placement of the cards of each player;
 - (4) A separate designated area located directly in front of the table inventory container for the placement of the community cards;
 - (5) The Payout odds for all authorized Wagers, including an optional bonus Wager, if the Nation Gaming Operation offers the optional Wager; and
 - (6) The inscription indicating the Payout limit per hand established by the Nation Gaming Operation or a generic inscription indicating that the game is subject to the posted Payout limit(s).
- (c) Each Let It Ride poker table shall have a Drop Box and a tip box

attached to it on the same side of the table as, but on opposite sides of the Dealer, in locations approved in writing by the SGA and the SGO.

- (d) If a Nation Gaming Operation offers an optional bonus Wager, the let it ride poker table shall also include the following equipment or devices, which shall be submitted to and approved in writing by the SGA, together with the procedures for their operation and use:
- (1) A wagering device at each betting position that acknowledges or accepts the placement of a bonus Wager;
 - (2) A control device that controls or monitors the placement of all bonus Wagers at a Gaming Table, including a "lock-out" mechanism that prevents the recognition of any bonus Wager that a player attempts to place after the Dealer has announced "No more bets;" and
 - (3) Any other equipment or device approved in writing by the SGA that contributes to the efficient operation or integrity of the game.

78. Minibaccarat tables; physical characteristics

- (a) Minibaccarat shall be played at a table having on one side places for a maximum of nine (9) seated players, and on the opposite side a place for the Dealer. The dimensions of a minibaccarat table shall be approved in writing by the SGA and the SGO.

- (b) The Layout for a minibaccarat table shall be approved in writing by the SGA and the SGO and shall contain, at a minimum:
 - 1. The name, trade name or logo of the Nation Gaming Operation;
 - 2. Numbered areas that correspond to the seat numbers for the purpose of marking vigorish; and
 - 3. An area designated for the placement of cards for the "Player's" and "Banker's" hands.

- (c) If Marker buttons are used for the purpose of marking vigorish, these Marker buttons shall be placed in the table inventory float container or in a separate rack designed for the purpose of storing Marker buttons. Such rack shall be placed in front of the table inventory float container during gaming activity.

- (d) Each minibaccarat table shall have a Drop Box and a tip box attached to it on the same side of the Gaming Table as, but on opposite sides of, the Dealer, and in locations approved in writing by the SGA and the SGO.

79. Pai gow poker table; pai gow poker shaker; physical characteristics

- (a) Pai gow poker shall be played at a table having on one side places for the players and on the opposite side a place for the Dealer.
- (b) The Layout for a pai gow poker table shall be approved in writing by the SGA and the SGO and shall contain, at a minimum,

the following:

- (1) Six (6) separate designated betting areas for the players at the table with each area being numbered one (1) through six (6);
 - (2) Two (2) separate areas located below each betting area which shall be designated for the placement of the high and second highest or low hands of that player;
 - (3) Two (2) separate areas designated for the placement of the high and second highest or low hands of the Dealer; and
 - (5) The name, trade name or logo of the Nation Gaming Operation.
- (c) Each pai gow poker table shall have a Drop Box and tip box attached to it on the same side of the Gaming Table as, but on opposite sides of, the Dealer, and in locations approved in writing by the SGA and the SGO.
 - (d) Pai gow poker shall be played with a container, to be known as a "pai gow poker shaker," which shall be used to shake three (3)

dice before each hand of pai gow poker is dealt in order to determine the starting position for the dealing or delivery of the cards. The pai gow poker shaker shall be designed and constructed to contain any feature the SGA may require to maintain the integrity of the game and shall, at a minimum, adhere to the following specifications:

- (1) The pai gow poker shaker shall be capable of housing three
 - (3) dice and shall be designed so as to prevent the dice from being seen while the Dealer is shaking it; and
 - (2) The pai gow poker shaker shall have the name, trade name or logo of the Nation Gaming Operation imprinted or impressed thereon.
- (e) Shaker security procedures
- (1) Pai gow shakers which have been filled with dice may only be stored in a locked compartment in the primary storage area. Pai gow shakers which have not been filled with dice may be stored in a locked compartment in the Pit stand.
 - (2) At the end of each gaming day a Pit manager shall inspect all Pai gow shakers that have been placed in use for gaming for evidence of tampering. Such evidence discovered at this time shall be immediately reported to the SGA, with a copy to the SGO. At a minimum, such report shall include:
 - a. The date, time and Shift when the tampering was discovered;
 - b. The table number where the pai gow shaker was used;

and

- c. The name and gaming license number of the individuals discovering the tampering.

80. Red dog table; physical characteristics

- (a) Red dog shall be played at a table having on one side places for no more than seven (7) players and on the opposite side a place for the Dealer.
- (b) The Layout for a red dog table shall be approved in writing by the SGA and the SGO, and shall contain, at a minimum:
 - (1) The name, trade name or logo of the Nation Gaming Operation;
 - (2) Two separate designated betting areas for each player, clearly marked to distinguish between the original Wager and the raise Wager in a manner approved in writing by the SGA, and situated so that the betting area for the raise Wager is closer to the player than the betting area for the original Wager;
 - (3) An area designated for the placement of the first, second and third card; and
 - (4) The Payout odds.
- (c) Each red dog table shall have a Drop Box and a tip box attached to it with the location of said boxes on the same side of the Gaming Table but on opposite sides of the Dealer, as approved in writing by the SGA and the SGO.

81. Roulette table; physical characteristics: roulette balls; inspection procedures; security procedures

- (a) Roulette table; physical characteristics; double zero roulette wheel used as a single roulette wheel.
 - (1) Roulette shall be played on a table having a roulette wheel of not less than thirty (30) inches in diameter at one end of the table and a roulette Layout imprinted on the opposite end of the table.
 - (2) Each roulette wheel shall be of a single zero variety or a double zero variety as described and depicted below:
 - a. Each single zero roulette wheel shall have thirty-seven (37) equally spaced compartments around the wheel where the roulette ball shall come to rest. The roulette wheel shall also have a ring of thirty-seven (37) equally spaced areas to correspond to the position of the compartments with one marked zero and colored green and the others marked one (1) to thirty-six (36) and colored alternately red and black which numbers shall be arranged around the wheel in a manner approved in writing by the SGA and the SGO. The color of each compartment shall either be a corresponding color to those depicted on the ring or a neutral color as approved in writing by the SGA and the SGO.
 - b. Each double zero roulette wheel shall have thirty-eight (38) equally spaced compartments around the wheel where the roulette ball shall come to rest. The roulette wheel shall also have a ring of thirty-eight

(38) equally spaced areas to correspond to the position of the compartments with one marked zero and colored green, one marked double-zero (00) and colored green, and the others marked one (1) to thirty-six (36) and colored alternately red and black which numbers shall be arranged in a manner approved in writing by the SGA and the SGO. The color of each compartment shall either be a corresponding color to those depicted on the ring or a neutral color as approved in writing by the SGA and the SGO.

- (3) A double zero roulette wheel may be used as a single zero roulette wheel, provided that:
- a. If a double zero table Layout is used, the "00" Wager area on the Layout is obscured with a cover or other approved device which clearly indicates that such a Wager is not available; and
 - b. Appropriate signage is posted at the roulette table to notify players that:
 1. A double zero roulette wheel is being used as a single zero roulette wheel, and that double zero (00) is not an available Wager;
 2. If the roulette ball comes to rest in a compartment marked double zero (00), the spin will be declared void and the wheel will be respun; and
 3. Wagers on red, black, odd, even, one (1) to

eighteen (18) and nineteen (19) to thirty-six (36) shall be lost if the roulette ball comes to rest in a compartment marked zero (0).

- (4) The Layout for a roulette table shall be approved in writing by the SGA and the SGO and shall contain, at a minimum:
 - a. The name, trade name or logo of the Nation Gaming Operation; and
 - b. Specific areas for the placement of the Wagers.
- (5) Notwithstanding subdivision (4) above, if the Nation Gaming Operation offers an optional progressive Wager, the Layout for that roulette table shall also include, in a manner approved in writing by the SGA and the SGO, designated areas for the placement of such Wagers.
- (6) Each roulette table shall have a Drop Box and a tip box attached to it, in locations approved in writing by the SGA and the SGO.

(b) Roulette balls

Balls used in gaming at roulette shall be made completely of a non-metallic substance and shall not be less than 12/16 of an inch nor more than 14/16 of an inch in diameter unless otherwise approved in writing by the SGA and the SGO.

(c) Roulette table inspection and security procedures

- (1) Prior to opening a roulette table for gaming activity, a Gaming Facility Supervisor or member of the security department shall:
 - a. Inspect the roulette table and roulette wheel for any foreign object such as a magnet or other contrivance that could affect the fair operation of such wheel;
 - b. Inspect the roulette wheel to assure that it is level and rotating freely and evenly;
 - c. Inspect the roulette wheel to assure that all parts are secure and free from movement;
 - d. Inspect the roulette ball by passing it over a magnet or compass to assure its non-magnetic quality; and
 - e. Verify that the Layout and signage comply with the Compact and its Appendices, if a double zero roulette wheel is being used as a single zero roulette wheel.

- (2) If the Nation Gaming Operation uses a roulette wheel which has external movable parts, any adjustments to the movable parts shall be made by a Gaming Facility Supervisor or a member of the maintenance department, in the presence of a Security Department Member. Adjustments to the movable parts of a roulette wheel that is located on the gaming floor shall only be made:
 - a. When the Gaming Facility is not open to the public; or
 - b. If the roulette wheel is moved to a secure location

outside the Gaming Facility as approved in writing by the SGA.

- (3) All adjustments shall be completed prior to the required inspections in paragraph (1) above.
- (4) The Nation Gaming Operation may replace any of the movable parts at any time, provided, however, if any one or more of the movable parts are external then an inspection must be completed by the SGA prior to reopening the roulette wheel and table for gaming activity.
- (5) The Nation Gaming Operation shall maintain a log which shall include, at a minimum, the date, the roulette table number, whether an adjustment or replacement was completed and the signature and gaming license number of the person making the adjustment or replacement.
- (6) When a roulette table is not open for gaming activity, the roulette wheel shall be secured by placing a cover over the entire wheel and securely locking such cover to the roulette table.

82. Sic bo table; physical characteristics; shaker; shaker security procedures

(a) Sic bo table; physical characteristics

- (1) Each sic bo table shall have a Drop Box and tip box attached to it on the same side of the Gaming Table as, but on opposite sides of, the Dealer, and in locations approved in writing by the SGA and the SGO.
- (2) Each sic bo table shall have an electrical device which, when the numeric value of each die has been entered, shall cause the winning combinations to be illuminated. The sic bo table shall have an area, as approved in writing by the SGA and the SGO, which depicts all permissible Wagers. Each dice combination shall have the capability to be illuminated, if it is a winning combination, after the numeric value of each die has been entered into the electrical device by the Dealer.
- (3) The Layout for a sic bo table shall be approved in writing by the SGA and the SGO and shall contain, at a minimum:
 - a. The name, trade name or logo of the Nation Gaming Operation; and
 - b. Specific areas designated for the placement of the Wagers; and
 - c. The Payout odds.

(b) Sic bo shaker

- (1) Sic bo shall be played with a sealed container, to be known as a "sic bo shaker," which shall be used to shake the dice in order to randomly arrive at the winning combinations. The sic bo shaker shall be designed and constructed to contain any feature the SGA may require to maintain the integrity of the game and shall, at a minimum, adhere to the following specifications:
 - a. The sic bo shaker shall have a compartment to secure the three dice and a separate cover which conceals the dice while the Dealer is shaking the sic bo shaker. The compartment to secure the three dice shall be transparent and the cover which conceals the dice shall be opaque;
 - b. The sic bo shaker shall have the capability of being sealed or locked in order to ensure the integrity of the dice contained therein;
 - c. The sic bo shaker shall have the name or trade name of the Nation Gaming Operation or its approved identifying logo imprinted or impressed thereon; and
 - d. The sic bo shaker shall be secured to the sic bo table when the table is open for gaming activity.

(c) Shaker security procedures

- (1) Sic bo shakers which have been filled with dice shall only be stored in a locked compartment located in the SGA approved primary storage area. Sic bo shakers which have

not been filled with dice may be stored in a locked compartment in the Pit stand.

- (2) At the end of each gaming day a Pit manager shall inspect all sic bo shakers that have been placed in use for gaming for evidence of tampering. Such evidence discovered at this time shall be immediately reported to the SGA, with a copy to the SGO. At a minimum, such reports shall include:
 - a. The date, time and Shift when the tampering was discovered;
 - b. The table number where the sic bo shaker was used; and
 - c. The name and gaming license number of the individuals discovering the tampering.

83. Wheel game table physical characteristics; Layout

(a) A wheel game table shall consist of the following:

(1) A mechanical, non-electronic wheel, circular in shape, with a diameter of not less than five (5) feet, The rim of the wheel shall be divided into fifty-four (54) equally spaced sections with twenty-three (23) sections containing a color, number or symbol indicating sixth prize, fifteen (15) sections containing a color, number or symbol indicating fifth prize, eight (8) sections containing a color, number or symbol indicating fourth prize, four (4) sections containing a color, number or symbol indicating third prize, two (2) sections containing a color, number or symbol indicating second prize, and two (2) sections containing a color, number or symbol indicating first prize. Each sections shall be covered with glass, plexiglass or a similar material.

(2) Spindles shall be constructed of stainless steel, or such other rigid, inflexible substance.

(3) A stationary indicator constructed of leather, rubber, plastic or such other firm, pliable substance which shall be utilized to identify the section occupying the space between two immediately adjacent spindles as the winning section.

(b) Wheel prize depictions. The sections required by paragraph

(a) (1) above shall be arranged clockwise around the rim of the wheel with the color, number or symbol indicating or corresponding to each prize in the following order: first prize,

sixth prize, fifth prize, sixth prize, fourth prize, fifth prize, sixth prize, third prize, sixth prize, fourth prize, sixth prize, fifth prize, sixth prize, second prize, sixth prize, fifth prize, sixth prize, fourth prize, fifth prize, sixth prize, third prize, sixth prize, fifth prize, fourth prize, sixth prize, fifth prize, sixth prize, first prize, fifth prize, fourth prize, fifth prize, sixth prize, fifth prize, sixth prize, third prize, sixth prize, fourth prize, sixth prize, fifth prize, sixth prize, second prize, sixth prize, fifth prize, sixth prize, fourth prize, fifth prize, sixth prize, third prize, sixth prize, fifth prize, fourth prize, sixth prize, fifth prize and sixth prize.

(c) Layout. The Layout for a wheel game table shall be approved, in writing, by the SGA and the SGO, and shall have imprinted thereon on, at a minimum, the following:

- (1) The name, trade name or logo of the Nation Gaming Operation;
- (2) Betting spaces which shall be used by patrons to place their Wagers, which shall contain the following:
 - a. Colors, numbers or symbols representing those monetary denominations for sixth prize, fifth prize, fourth prize, third prize, second prize and first prize; and
 - b. The payoff odds paid to the winning player whose Wager was placed within a betting space matching the color, number or symbol, or a combination of colors, numbers or symbols in which the wheel's stationary indicator came to rest. Minimum payoff odds shall be as

follows:

1. Sixth prize: 1 to 1
2. Fifth prize: 2 to 1
3. Fourth prize: 5 to 1
4. Third prize: 10 to 1
5. Second prize: 20 to 1
6. First prize: 45 to 1

84. Casino war table; physical characteristics

- (a) Casino war shall be played at a table having betting positions for no more than seven players on one side of the table and a place for the dealer on the opposite side.
- (b) The Layout for a casino war table shall be approved in writing by the SGA and the SGO in writing and shall have imprinted thereon, at a minimum, the following:
 - (1) The name or trade name of the Nation Gaming Operation;
 - (2) A separate designated betting area at each betting position for the placement of initial and war wagers;
 - (3) A separate designated betting area for the placement of tie wagers; and
 - (4) The payout odds for a tie wager and war wager.
- (c) Each casino war table shall have a drop box and a tip box attached to it on the same side of the gaming table as, but on opposite sides of, the dealer, in locations approved in writing by the SGA and the SGO.
- (d) In order to collect the cards at the conclusion of a round of play and at such other times as provided in the Compact or its Appendices, each three card poker table shall have a discard rack securely attached to the top of the dealer's side of the table. The height of each discard rack shall equal the height of the cards, stacked one on top of the other, contained in the total number of decks that are to be used in the dealing shoe at

that table. Notwithstanding, the foregoing, a taller discard rack may be used if such rack has a distinct and clearly visible mark on its side to show the exact height for a stack of cards equal to the total number of cards contained in the number of decks to be used in the dealing shoe at that table.

85. Spanish blackjack table; physical characteristics

- (a) Spanish 21 shall be played at a table having betting positions for no more than six players on one side of the table and a place for the dealer on the opposite side.
- (b) The Layout for a Spanish 21 table shall be approved in writing by the SGA and the SGO and shall have imprinted thereon, at a minimum, the following:
 - (1) The name or logo of the Nation Gaming Operation;
 - (2) A separate designated betting area at each betting position for the placement of the following wagers:
 - a. The required Spanish 21 wager; and
 - b. An optional match-the-dealer wager;
 - (3) The following inscriptions:
 - a. "Blackjack Pays 3 to 2:"
 - b. "Dealer Must Draw to 16 and Stand on All 17's;"
 - c. "Insurance Pays 2 to 1 . "
 - (4) The payout odds for each of the wagers listed in this section unless the odds are included in the sign required below; and
 - (5) The payout odds for the match-the-dealer wager unless the

odds are included in the sign required below.

- (c) The Nation Gaming Operation shall post a sign approved by the SGA at each Spanish 21 table, which explains:
 - (1) That doubled down hands are not eligible for the additional payouts in Section (f) (6) of Appendix A;
 - (2) That doubled down hands and split hands are not eligible for the additional payouts in Section (f) (7) of Appendix A; and
 - (3) The payout odds for the match-the-dealer wager, if those payout odds are not imprinted on the Layout.

- (d) Each Spanish 21 table shall have a drop box and a tip box attached to it on the same side of the gaming table as, but on opposite sides of, the dealer, in locations approved by the SGA and the SGO in writing.

- (e) In order to collect the cards at the conclusion of a round of play as required by these rules and at such other times as provided in the rules of the Nation Gaming Operation, each Spanish 21 table shall have a discard rack securely attached at the top of the dealer's side of the table. The height of each discard rack shall equal the height of the cards, stacked one on top of the other, contained in the total number of decks that are to be used in the dealing shoe at that table; provided, however, that a taller discard rack may be used if such rack has a distinct and clearly visible mark on its side to show the exact height for a stack of cards equal to the total number of

cards contained in the number of decks to be used in the dealing shoe at that table. Whenever a double shoe is used at a Spanish 21 table, the same number of decks shall be used in each side of the double shoe, and the height and marking requirements as set forth above for the table's discard rack shall be determined from the number of decks used in one side of the shoe.

- (f) A Spanish 21 table may have attached to it, as approved by the SGA and the SGO in writing, a card reader device that permits the dealer to read his or her hole card in order to determine if the dealer has a blackjack in accordance with these rules. If a Spanish 21 table has an approved card reader device attached to it, the floorperson assigned to the table shall inspect the card reader device at the beginning of each gaming day. The purpose of this inspection shall be to insure that there has been no tampering with the device and that it is in proper working order.

86. Multiple action blackjack table; physical characteristics

- (a) Multiple Action Blackjack shall be played at a table having on one side places for the players and on the opposite side a place for the dealer. Each Multiple Action Blackjack table shall have a drop box and a tip box attached to the dealer's side of the gaming table in a location approved in writing by the SGA and the SGO.

- (b) Layout. The Layout for a Multiple Action Blackjack table shall be approved in writing by the SGA and the SGO and shall contain, at a minimum:
 - (1) The name or logo of the Nation Gaming Operation; and

 - (2) Specific areas designated for the placement of wagers, which betting areas shall not exceed three per player and places for up to seven players.

 - (3) The following inscriptions:
 - a. "Blackjack pays 3 to 2".

 - b. "Dealer must draw to 16 and stand on all 17's"; and

 - c. "Insurance pays 2 to 1".

 - (4) Card reader device. A Multiple Action Blackjack table may have attached to it, as approved in writing by the SGA and the SGO, a card reader device which permits the dealer to read his or her hole card in order to determine if the dealer has a blackjack. If a Multiple Action Blackjack

table has an approved card reader device attached to it, the floorperson assigned to the table shall inspect the card reader device at the beginning of each gaming day. The purpose of this inspection shall be to insure that there has been no tampering with the device and that it is in proper working order.

- (5) Discard rack. In order to collect the cards at the conclusion of a round of play and at such other times as provided in the Compact or its Appendices, each Multiple Action Blackjack table shall have a discard rack securely attached to the top of the dealer's side of the table. The height of each discard rack shall equal the height of the cards, stacked one on top of the other, contained in the total number of decks that are to be used in the dealing shoe at that table; provided, however, that a taller discard rack may be used if such rack has a distinct and clearly visible mark on its side to show the exact height for a stack of cards equal to the total number of cards contained in the number of decks to be used in the dealing shoe at that table.
- (6) Automated card shuffling device (Optional). An automated card shuffling device is a device which can automatically perform a shuffle. Such a device shall meet the requirements of Appendix B, Section 61.

87. Three card poker table; physical characteristics

- (a) Three-card poker shall be played at a table having betting positions for the players on one side of the table and a place for the dealer on the opposite side. Such betting positions shall not exceed nine in number depending on the size of the table.

- (b) The Layout for a three card poker table shall be approved in writing by the SGA and the SGO and shall contain, at a minimum:
 - (1) The Logo of the Nation Gaming Operation;

 - (2) A separate designated betting area at each betting position for the placement of "ante" wagers;

 - (3) A separate designated betting area located immediately in front of each ante wager betting area for the placement of "play" wagers;

 - (4) A separate designated betting area located immediately behind each ante wager betting area for the placement of "pair plus" wagers; and

 - (5) Inscriptions that advise patrons, in accordance with subsection (1) or Appendix A and as approved by the SGA in writing, the payout odds for ante and play wagers, pair plus wagers and ante bonuses and that "Dealer Plays with Queen High or Better".

- (c) Each three-card poker table shall have a drop box and a tip box attached to it on the same side of the gaming table as, but on

opposite sides of, the dealer, and in locations approved by the SGA and the SGO in writing.

- (d) In order to collect the cards at the conclusion of a round of play and at such other times as provided in the Compact or its Appendices, each three card poker table shall have a discard rack securely attached to the top of the dealer's side of the table. The height of each discard rack shall equal the height of the cards, stacked one on top of the other, contained in the total number of decks that are to be used in the dealing shoe at that table. Notwithstanding, the foregoing, a taller discard rack may be used if such rack has a distinct and clearly visible mark on its side to show the exact height for a stack of cards equal to the total number of cards contained in the number of decks to be used in the dealing shoe at that table.

88. Issuance and use of slot tokens for gaming; prize tokens; slot token and prize token specifications; promotional non-gaming tokens

- (a) The Nation Gaming Operation may issue the following types of metal disks having two faces and an edge:
1. A "slot token" that is:
 - i. Designed for gaming use in the hoppers of the Nation Gaming Operations Gaming Devices and in keno Wagering within the Nation Gaming Operation;
 - ii. Capable, upon insertion into the coin acceptor of a designated Gaming Device operated by the Nation Gaming Operation that issued the slot token, of activating the play of that Gaming Device;
 - iii. Issuable, in an exchange with a patron upon request, only from a slot booth, the cashier's cage a change machine or bill changer, or by a changeperson;
 - iv. Redeemable, by the Nation Gaming Operation promptly upon request of the patron surrendering one or more slot tokens, only at a coin redemption booth, a slot booth or the cashier's cage for an equivalent amount of Cash or for a Nation Gaming Operation Check in the amount of the slot tokens surrendered and dated the day of the redemption; and, at the Nation Gaming Operation's option redeemable upon request of the patron by mail, provided such redemption shall be effectuated by a Cage Supervisor.

2. A "prize token" that is:
 - i. Designed to be awarded and issued only as a Payout from a Payout-only hopper of a designated Gaming Device.
 - ii. Redeemable, by the Nation Gaming Operation upon request of the patron surrendering one or more prize tokens, only at a coin redemption booth, a slot booth or the cashier's cage for an equivalent amount of Cash or for a Nation Gaming Operation Check in the amount of the prize tokens surrendered and dated the day of the redemption; and, at the option of Nation Gaming Operation, redeemable upon request of the patron by mail, provided such redemption shall be effectuated by a Cage Supervisor.
- (b) Each slot token and each prize token shall be designed so that it:
1. Clearly identifies the name or trade name of the Nation Gaming Operation;
 2. Clearly states its face value;
 3. Contains on at least one face, in the case of a slot token only, a statement, approved by the Nation Gaming Operation as to form and content, that notifies a patron that the slot token will be accepted to activate play only in Gaming Devices operated by the Nation Gaming Operation.

4. Contains the statement "Not Legal Tender";
5. Is not deceptively similar to any current or past coin of the United States or a foreign country;
6. Is of a size or shape or has other characteristics which physically prevents its use in lawful vending machines or other machines designed to be operated by coins of the United States, except Gaming Devices;
7. Is not manufactured from:
 - i. A three-layered material consisting of a pure copper core clad on both sides with a copper-nickel alloy;
 - ii. A copper based alloy, unless the total zinc, nickel, aluminum, magnesium and other alloying metal exceeds 25 percent of the token's weight; or
 - iii. A ferromagnetic material;
8. Shall not have a diameter which is between:

0.680 inch and 0.860 inch

0.890 inch and 0.980 inch

1.018 inches and 1.068 inches

1.180 inches and 1.230 inches

1.475 inches and 1.525 inches

9. Shall not weigh less than two grams and shall not be less than 0.060 inch thick;
10. Incorporates such anti-counterfeiting features and other security measures as the SGA may require; and
11. Contains on each face, in the case of a prize token only, a statement, approved by the SGA in writing as to form and content, that notifies a patron that the prize token does not activate play.

(c) In addition to the above requirements, the following denominations of slot tokens must also meet the following specifications, with manufacturing tolerances approved by the SGA in writing:

1. Denominations	Diameter
\$.10	.875 inches
\$.25	.986 inches
\$.50	1.175 inches
\$ 1.00	1.469 inches
\$ 2.00	1.340 inches
\$ 5.00	1.750 inches
\$ 10.00	1.700 inches
\$ 20.00	1.650 inches
\$ 25.00	1.875 inches or 1.950 inches
\$ 50.00	1.812 inches
\$ 100.00	1.600 inches
\$ 500.00	1.550 inches

(d) Each prize token with a face value that is less than the

denomination of any slot token that is approved for use by any Nation Gaming Operation shall be designed, through differences between it and such slot token in their metal content, diameter, thickness or by any other means approved by the SGA in writing, to prevent its use for activating play at any Gaming Device that is capable of accepting any slot token of greater denomination than the prize token.

(e) The Nation Gaming Operation, in accordance with its approved System of Internal Controls, may encase its prize tokens in clear plastic provided that:

1. The plastic does not hamper the Payout of prize tokens from a Payout-only hopper;
2. A patron with reasonable ease can remove the prize token from the plastic; and
3. The Nation Gaming Operation:
 - i. Redeems each prize token under the same terms and conditions whether or not the prize token, when presented for redemption, is encased in plastic as originally issued by the Nation Gaming Operation
 - ii. Reasonably notifies its patrons that prize tokens that are encased in plastic when originally issued to the patron may be redeemed without removing the plastic.

(f) No slot token or prize token shall be issued by the Nation Gaming Operation or utilized in a Gaming Facility unless and until:

1. The design specifications of the proposed slot token or prize token are, prior to the manufacture of the slot token or prize token, submitted to and approved by the SGA in writing, which submission shall include a detailed schematic depicting the actual size of the token's diameter and thickness and, as appropriate, location of the following:
 - i. Each face;
 - ii. The edge; and graphics or security
 - iii. Any words, logos, designs, measures contained on the slot token or prize token; and
 2. A sample slot token or prize token, manufactured in accordance with its approved design specifications, is submitted to and approved by the SGA in writing.
- (g) The Nation Gaming Operation may issue promotional non-gaming tokens not intended for and prohibited from use in gaming in its facility. The physical characteristics of promotional non-gaming tokens shall be sufficiently distinguishable from approved design specifications of any authorized slot token issued by the Nation Gaming Operation so as to reasonably ensure that they will not be confused with authorized slot tokens and that they will be incapable of activating Gaming Device play at any Gaming Device operated by the Nation Gaming Operation. In addition, at a minimum, such promotional non-gaming tokens shall:

1. Be unique in terms of size or metallic composition;
2. Be not deceptively similar to any current or past coin of the United States or a foreign country, nor have characteristics which physically allow their use in lawful vending machines or other machines designed to be operated by coins of the United States; and
3. Bear the name and location of the Nation Gaming Operation on at least one face and language on both faces stating that they do not activate Gaming Device play.

89. Wagering at Gaming Devices; use of slot tokens and prize tokens

- (a) All Wagering at Gaming Devices in a Gaming Facility shall be conducted with coins or slot tokens; provided, however, that currency may be accepted through bill changers.
- (b) Slot tokens may be used to make keno Wagers.
- (c) Prize tokens shall not be used for keno Wagering or to activate play at Gaming Devices.

90. Slot tokens and prize tokens; receipt, inventory, security, storage and destruction

- (a) The Nation Gaming Operation shall inspect all slot tokens or prize tokens, or any combination thereof, upon receipt from the manufacturer or distributor to ensure, at a minimum, that:
 - 1. The quantity and denomination of slot tokens or prize tokens that are actually received from the manufacturer or distributor agrees with the amount of such tokens listed on the shipping documents; and
 - 2. There are no physical defects in the slot tokens or prize tokens that were so received.
- (b) The inspection required by (a) above shall be conducted by at least three employees of the Nation Gaming Operation (the "Inspection team"). Each inspection team shall consist of at least one representative from the accounting or auditing department of the Nation Gaming Operation and one representative from any of the Nation Gaming Operation's other mandatory departments.
- (c) The Nation Gaming Operation shall utilize procedures to record and process the receipt, inventory, storage and destruction of slot tokens and prize tokens.

Appendix C

Procedure for Issuance of an Employee License

Pursuant to the Nation-State Gaming Compact Between the Seneca Nation of Indians and the State of New York ("Compact"), this Appendix C sets forth below the procedure for issuance of an employee license:

- (1) Class III Gaming Key Employee License. No person may commence or continue employment as a Class III Gaming Key Employee unless such person is the holder of a valid current Class III Gaming Key Employee License issued by the Seneca Gaming Authority ("SGA")

- (2) Class III Gaming Employee. No person may commence or continue employment as a Class III Gaming Employee unless such person is the holder of a valid current Class III Gaming Employee License issued by the SGA.

- (3) Non-Class III Gaming Employee. No person may commence or continue employment as a Non-Class III Gaming Employee unless such person is the holder of a valid current Non-Class III Gaming Employee License issued by the SGA.

- (4) Procedure for Employee License Applications. Each applicant for an employee license shall submit the applicable completed employee license application to the SGA, on forms approved by the SGA and the State Gaming Officials ("SGO"). The Nation Gaming Operation shall certify on said application that submission of the application has been approved and upon receipt of a license the applicant will be employed. Such employee license application forms shall contain such information, documentation and assurances as may be required

by the SGA and the SGO concerning the applicant's personal and family history, personal and business references, criminal conviction record, business activities, financial affairs, gaming industry experience, gaming school education and general educational background. Each completed license application submitted to the SGA pursuant to the provisions hereof shall be accompanied by the applicant's State, Federal and, if applicable, Canadian fingerprint card (s) and photograph(s) as required by the SGA and the SGO. The SGA shall forward the application to the SGO. Promptly upon receipt of a completed license application, the SGO shall forward a copy thereof to the law enforcement agency for investigation.

- (5) Background Investigation of Applicants. Upon receipt of an application for an employee license, the SGO shall promptly cause State and Federal, and Canadian if appropriate, criminal record checks to be performed to determine whether the applicant has any criminal history. The SGO may direct the law enforcement agency to undertake such further investigation of the applicant as SGO deems appropriate and shall, as soon as practicable after completion of the license investigation, report the results of such investigation to the SGO.
- (6) Action by SGO. Upon its receipt of a background investigation report from the law enforcement agency, SGO shall, within a reasonable amount of time, provide the SGA with a written report summarizing the information that it has obtained during the course of the background investigation. Such report shall state that the SGO considers the applicant either suitable or unsuitable for the Employee License. SGO may report an applicant as unsuitable for an Employee License only if the

background investigation of the applicant reveals that the applicant;

- (a) is under the age of 18;
- (b) has been convicted of a crime whose elements would constitute a felony under the laws of New York State or is punishable as a felony in another jurisdiction;
- (c) has been convicted of any form of bookmaking or other form of illegal gambling;
- (d) has been convicted of any fraud or material misrepresentation in connection with gaming;
- (e) has otherwise been determined to be a person whose prior activities, criminal record, if any, or reputation, habits and associations pose a threat to the effective regulation of gaming or create or enhance the chances of unfair or illegal practices, methods, and activities in the conduct of the Class III Gaming permitted pursuant to the Compact; or
- (f) has failed to provide any information reasonably required to investigate the applicant for an Employee License or to reveal any fact material to such application, or has furnished any information which is untrue or misleading in connection with such application.

In the event of a report that the SGO considers an applicant to be unsuitable, the SGO report shall set forth the specific reason(s) supporting such consideration.

- (7) Action by SGA. Only upon receipt of a report from SGO that indicates an applicant is suitable, the SGA, may, in its sole discretion pursuant to applicable Nation regulations, issue the applicable Employee License. SGA shall promptly notify SGO in writing of any Class III Gaming Key Employee License, Class III Gaming Employee License or Non-Class III Gaming Employee License that it issues. Upon termination of a licensed employee's employment, the SGA shall promptly notify SGO of such termination in writing.
- (8) Suspension, Revocation or Denial of Renewal of Suitability Report or Employee License. SGA shall suspend, revoke or deny a renewal of any Employee License if new information concerning facts arising either prior to or since the issuance of the initial report of suitability, or any renewal thereof, comes to the attention of SGA and such information would have provided grounds under Section 6 to justify issuance of an initial report of unsuitability.
- (9) Notification of Applicant. In the event the SGO recommends an applicant to be unsuitable, the SGA will notify the applicant of such action in writing setting forth the reason (s) for said action. In the event the SGA denies, suspends, revokes or denies renewal of license, the SGA will notify the applicant in writing of such denial, suspension, revocation or denial of renewal of a license. The notification shall set forth the reason(s) for such action. Upon petition of the applicant, the action of the SGA in denying a license or suspending, revoking or denying renewal of a license on the basis of Section 6 (b) or 6 (e) may be reviewed by the Licensing Review Commission or such other governmental agency as may be created by the Nation for such

purposes.

(10) Review of Report of Unsuitability.

- (a) Pre-Report Review. In the event the SGO decides to issue a report of unsuitability with respect to an applicant, SGO shall notify SGA of such intention prior to issuance of such report. Upon a request by SGA, or other governmental agency as may be created by the Nation for such purpose, made within thirty (30) days following receipt of such notice, representatives of SGO and the SGA, or such other governmental agency as may be created by the Nation for such purpose, shall promptly meet to discuss the existence of any mitigating circumstances relevant to SGO's proposed report that the applicant is unsuitable. SGO shall consider in good faith any request by the SGA, or such other governmental agency as may be created by the Nation for such purpose, that the applicant be found suitable on the basis of such mitigating circumstances. SGO may proceed to issue its report of unsuitability if:
- i. SGA, or such other governmental agency as may be created by the Nation for such purpose, following receipt of the SGO's notice, notifies the SGO that it does not object to a finding of unsuitability; or
 - ii. SGA, or such other governmental agency as may be created by the Nation for such purpose, fails to request a meeting with the SGO within thirty (30) days of its receipt of notice pursuant to this

Paragraph; or

- iii. following a meeting to discuss mitigating circumstances, the SGA, or such other governmental agency as may be created by the Nation for such purpose, withdraws its request for reconsideration; or
- iv. the SGO determines upon due consideration that a finding of unsuitability should be issued notwithstanding any request hereunder,

provided, however, a report of unsuitability based on 6(b) or 6 (e) may, upon petition by the applicant, be submitted to the Licensing Review Commission for final decision.

(b) Licensing Review Commission Process.

- i. Licensing Review Commission. A Licensing Review Commission shall be created which consists of three (3) members who are not employees of either the State or the Nation. One (1) member shall be selected by each of the State and Nation and the third member shall be selected by the first two members selected. All decisions rendered by the Licensing Review Commission shall be consistent with the terms and conditions of the Compact. The Licensing Review Commission shall meet not less than twice each year to consider resolutions as provided below.

- ii. SGA Request for Review. In addition to the review procedures set forth in Paragraph 9 above, applicants may, by written request to the SGA, seek review of a report of unsuitability by the SGO when the sole basis for such report was either Section 6(b) or 6(e).
 - a. For purposes of a report of unsuitability based on Section 6(b), if SGA determines, based upon extenuating circumstances hereinafter set forth, that (x) the felony offense for which the applicant was convicted will not have a material effect on the applicant's fitness or ability to perform the duties or responsibilities for which the applicant seeks licensure, and (y) the applicant is of good moral character, SGA shall forward to the Licensing Review Commission, with a copy to SGO, a resolution requesting that the Licensing Review Commission undertake a de novo review of the application.

The extenuating circumstances that would justify such a de novo review, all of which must be met to justify a resolution requesting de novo review, are as follows:

- i. the applicant's offense does not equate to greater to greater than a class E felony; or the "felony" character of such conviction resulted from a statutory or other

aggravating sentencing circumstance
following multiple lesser convictions under
the Vehicle and Traffic Laws;

- ii. the applicant has not been convicted of more than one felony offense or the "felony" character of such conviction resulted from a statutory or other aggravated sentencing circumstance following multiple lesser convictions under the Vehicle and Traffic Laws;
- iii. five years have passed since the expiration of the sentence imposed for the felony conviction;
- iv. the applicant has not been convicted of any misdemeanor or felony offense since the expiration of the sentence imposed;
- v. the felony offense for which the applicant was convicted was a non-violent offense or the "felony" character of such conviction resulted from a statutory or other aggravated sentencing circumstance following multiple lesser convictions under the Vehicle and Traffic Laws; and
- vi. if the offense for which the applicant was convicted was alcohol or drug related, the applicant has completed a program of rehabilitation or an employee

assistance program.

b. For purposes of a report of unsuitability based upon Section 6(e), if the SGA determines that, based upon a reasonable assessment of

the applicant's circumstances, that (x) the applicant would not pose a threat to the effective regulation of gaming or create or enhance the changes of unfair or illegal practices, methods, or activities in the conduct of Class III Gaming permitted pursuant to the Compact, and (y) the applicant is of good moral character, SGA shall forward to the Licensing Review Commission, with a copy to SGO, a resolution requesting that the Licensing Review Commission undertake a de novo review of the application.

(iii) Licensing Review Commission Procedure. Upon receipt of the SGA resolution requesting review, the Licensing Review Commission shall examine the applicant's file and make a de novo determination of his or her suitability. Applicants who have obtained a resolution for a de novo review shall appear before the Licensing Review Commission to discuss applicant's employment, criminal history and any other relevant and related matters. The Licensing Review Commission shall determine the fitness or ability of the applicant to perform the duties or responsibilities applied for and whether such applicant's employment would impair public confidence and trust in the credibility and

integrity of the regulation and operation of gaming under the Compact. Within five (5) days of such hearing, the Licensing Review Commission shall make an appropriate recommendation to the SGA regarding the applicant, which shall be binding on the SGA. All decisions by the Licensing Review Commission must be consistent with the terms and conditions of this Compact.

- (11) Duration of License and Renewal. Any employee license issued shall be effective for two years from the date of issuance; provided, that a licensed employee who has applied for renewal may continue to be employed under the expired license until final action is taken on the renewal application by the SGA and the SGO. Previously licensed applicants or applicants for renewal shall provide currently updated application material with updated Federal and, if applicable, Canadian fingerprint card(s) but will not be required to re-submit historical data already on file with the SGA and the SGO. No additional investigation of previously submitted information of an applicant for renewal shall be required unless new information concerning the renewal applicant's continuing suitability or eligibility for a license comes to the attention of the SGA or the SGO. Upon receipt of the renewal application, the SGA shall forward it to the SGO. The SGO shall in turn forward the renewal application to the law enforcement agency for an updated background investigation if warranted based upon new information that comes to the attention of the SGA or the SGO concerning the renewal applicant's continuing suitability or eligibility for a license.

- (12) Temporary Licenses.

- (a) Current Valid License. Each applicant for an employee license who files a copy of a current valid gaming employee license or gaming key employee license issued by New Jersey, Nevada or Mississippi together with his completed application and fingerprint card(s) shall be issued a temporary report of suitability for purposes of a temporary Class III Gaming Employee License or a temporary Class III Gaming Key Employee License, as applicable, pending determination of such applicant's suitability or eligibility for a Class III Gaming Employee License or Class III Gaming Key Employee License pursuant to this section. Any applicant for a Class III Non-Gaming Employee License who files a copy of a current valid non-gaming employee registration issued by New Jersey, Nevada or Mississippi together with his completed application and State fingerprint card(s) shall be issued a temporary report of suitability for purposes of a temporary Class III Non-Gaming Employee License pending determination of such applicant's suitability or eligibility for a Class III Non-Gaming Employee License pursuant to this Section.
- (b) Temporary Licensing and Findings of Suitability. The Nation Gaming Operation may request the SGA to issue a temporary license for any applicant. In that event, the SGA may request, in writing, the SGO to issue a temporary finding of suitability at the time of the submission of the application and applicant's fingerprint card(s) to the SGO. The SGO shall issue a temporary finding of suitability for any applicant whose application discloses no grounds reasonably sufficient to disqualify him or her in the judgment of the SGO and the State

fingerprint check does not disclose grounds for denial of a finding of suitability. Such temporary finding of suitability shall be issued (or denied) as soon as practicable. The SGA may issue a temporary license provided that the SGO has first issued a temporary finding of suitability to the applicant. The temporary finding of suitability and temporary license shall remain in effect until suspended, revoked or upon the issuance or denial of a finding of suitability. If the SGO denies issuance of a temporary finding of suitability, it shall notify the SGA setting forth the reason(s) for the denial in writing. Such denial shall not interrupt of the processing the application for a finding of suitability and license unless such application is withdrawn by the SGA or Nation Gaming Operation.

- (13) Fee for License. The cost of an employee license investigation shall be borne by the applicant in accordance with the fee schedule approved by the SGA and the SGO.
- (14) Badges. All licensed employees having access to the Gaming Facilities shall upon the commencement of such employment be provided with an identification badge by the SGA which shall be prominently displayed by the licensee at all times when on the premises of the Gaming Facility. The SGA shall recover such badge from an employee upon the termination of employment at a Gaming Facility.

Appendix D

Procedure for Issuance of Class XII Gaming Enterprise License

Pursuant to the Nation-State Gaming Compact Between the Seneca Nation of Indians and the State of New York ("Compact") , this Appendix D sets forth below the procedure for issuance of a Class III Gaming Enterprise License:

- (a) Class III Gaming Enterprise License. No enterprise may provide Class III Gaming related service, Class III Gaming related supplies or Class III Gaming related equipment to the Nation Gaming Operation unless such enterprise is the holder of a valid current Class III Gaming Enterprise License issued by the Seneca Gaming Authority ("SGA") The Nation, as a governmental entity, is not subject to this licensing requirement.

- (b) Procedure for Licensing. Each applicant for a Class III Gaming Enterprise License shall submit a completed enterprise license application to the SGA, on forms approved by the SGA and the State Gaming Officials ("SGO"). The Nation Gaming Operation shall certify on said application that submission of the application has been approved and upon receipt of a license, the applicant's services, supplies and/or equipment will be utilized by the Nation Gaming Operation. Such Class III Gaming Enterprise License application shall contain such information, documentation and assurances as may be required by the SGA and the SGO which shall identify all of said applicant's principals and which shall identify all of said applicant's and each such principal' s personal and family history, personal and business references, criminal conviction record, business activities, financial affairs, prior gaming

industry experience and general education background; all of the foregoing as may be applicable to such applicant or such principal. For purposes of this Section, a principal includes: (a) each of an applicant's officers and directors; (b) each of an applicant's principal management employees, including any chief executive officer, chief financial officer, chief operating officer or general manager if such employees have responsibility for Class III Gaming related services to the Nation Gaming Operation; (c) each of an applicant's owners or partners if an unincorporated business; (d) each of an applicant's shareholders who owns more than five percent of the shares of the corporation if a corporation; and (e) each natural person other than a conventional lending institution who has provided financing for the enterprise constituting more than 10 percent of the total financing of the enterprise. Each completed Class III Gaming Enterprise License application submitted to the SGA pursuant to the provisions hereof, shall be accompanied by the State, Federal and, if applicable, Canadian fingerprint card(s) and photograph(s) of each principal of the applicant in form as required by the SGA and the SGO. The SGA shall forward the application to the SGO. Promptly upon receipt of a completed license application, the SGO shall forward a copy thereof to the law enforcement agency for investigation.

(c) Background Investigation of Applicants. Upon receipt of an application for a Class III Gaming Enterprise License, the SGO shall promptly cause State and Federal, and Canadian, if appropriate, criminal record checks to be performed to determine whether the applicant or any of its principals has any criminal history. The SGO may direct the law enforcement agency to undertake such further investigation of the

applicant and the applicant's principals as SGO deems appropriate and shall, as soon as practicable after completion of the license investigation, report the results of such investigation to the SGO.

- (d) Action by SGO. Upon its receipt of a background investigation report from the law enforcement agency, SGO shall, within a reasonable amount of time, provide the SGA with a written report summarizing the information that it has obtained during the course of the background investigation. Such report shall state that the SGO considers the applicant either suitable or unsuitable for a Class III Gaming Enterprise License. SGO may report an applicant as unsuitable for a Class III Gaming Enterprise License only if the background investigation of the applicant reveals that the enterprise or a principal of the enterprise:
- (1) has been convicted of a crime whose elements would constitute a felony under the laws of New York State or is punishable as a felony in another jurisdiction;
 - (2) has been convicted of any form of bookmaking or other form of illegal gambling;
 - (3) has been convicted of any fraud or material misrepresentation in connection with gaming;
 - (4) has otherwise been determined to be a person whose prior activities, criminal record, if any, or reputation, habits and associations pose a threat to the effective regulation of gaming or create or enhance the chances of unfair or illegal practices, methods, and activities in

the conduct of the Class III Gaming permitted pursuant to the Compact;

- (5) has failed to provide any information reasonably required to investigate the applicant for a Class III Gaming Enterprise License or to reveal any fact material to such application, or has furnished any information that is untrue or misleading in connection with such application; or
- (6) a principal of the applicant is under the age of 18.

In the event of a report that the SGO considers an applicant to be unsuitable, the SGO report shall set forth the specific reason(s) supporting such consideration.

- (e) Action by SGA. Only upon receipt of a report from SGO that indicates an applicant is suitable, the SGA, may, in its sole discretion pursuant to applicable Nation regulations, issue a Class III Gaming Enterprise License. SGA shall promptly notify SGO in writing of any Class III Gaming Enterprise License that it issues.
- (f) Suspension, Revocation or Denial of Renewal of Suitability Report or Class III Gaming Enterprise License. SGA shall suspend, revoke or deny a renewal of any Class III Gaming Enterprise License if new information concerning facts arising, either prior to or since the issuance of the initial report of suitability, or any renewal thereof, comes to the attention of SGA and such information would have provided grounds under Section (d) to justify issuance of an initial report of unsuitability.

- (g) Notification of Applicant. In the event the SGO reports an applicant to be unsuitable, the SGA will notify the applicant of such action in writing setting forth the reason(s) for said action. In the event the SGA denies, suspends, revokes or denies renewal of a license, the SGA will notify the applicant of such denial, suspension, revocation or denial of renewal of a license. The notification shall set forth the reason(s) for such action. The action of the SGA in denying a license or suspending, revoking or denying renewal of a license on the basis of Section (d) (1) or (d) (4) may, upon petition by the applicant, be reviewed by the Licensing Review Commission or such other governmental agency as may be created by the Nation for such purposes.
- (h) Review of Report of Unsuitability
- (1) Pre-Report Review. In the event the SGO decides to issue a report of unsuitability with respect to an applicant, prior to issuance of such report, SGO shall notify SGA of such intention and the provisions of Appendix C, Paragraph 10(a) shall apply.
- (2) Licensing Review Commission Process. In addition to the review procedures set forth in Paragraph (g) above, applicants may seek review of a report of unsuitability as set forth in Appendix C, Paragraph 10(b) as such procedures may apply to it or its principals.
- (i) Duration of License and Renewal. Any Class III Gaming Enterprise License issued by the SGA shall be effective for two years from the date of issuance; provided, that a licensed enterprise that has applied for renewal may continue to

provide services under the expired license until final action is taken on the renewal application by the SGA and the SGO. Previously licensed applicants or applicants for renewal shall provide currently updated application material with updated Federal and, if applicable, Canadian fingerprint card(s) but will not be required to re-submit historical data already on file with the SGA and the SGO. No additional investigation of previously submitted information of an applicant for license renewal shall be required unless new information concerning the renewal applicant's continuing suitability or eligibility for a license comes to the attention of the SGA or the SGO. Upon receipt of the renewal application, the SGA shall forward it to the SGO. The SGO shall in turn forward the renewal application to the law enforcement agency for an updated background investigation if warranted based upon new information that comes to the attention of the SGA or the SGO concerning the renewal applicant's continuing suitability or eligibility for a license.

(j) Temporary Licenses.

- (1) Current Valid License. Each applicant for a Class III Gaming Enterprise License that files a copy of a current valid gaming services enterprise license issued by New Jersey, Nevada or Mississippi together with its completed application and fingerprint card(s) shall be issued a temporary report of suitability for purposes of a temporary Class III Gaming Enterprise License, pending determination of such applicant's suitability or eligibility for a Class III Gaming Enterprise License pursuant to this Section.

(2) Temporary Licensing and Findings of Suitability. The Nation Gaming Operation may request the SGA to issue a temporary Class III Gaming Enterprise License for any applicant. In that event, the SGA may request, in writing, the SGO to issue a temporary finding of suitability at the time of the submission of the application of applicant and application and fingerprint card(s) of applicant's principals to the SGO. The SGO shall issue a temporary finding of suitability for any applicant whose application discloses no grounds reasonably sufficient to disqualify it in the judgment of the SGO and the State fingerprint check does not disclose grounds for denial of a finding of suitability. Such temporary finding of suitability shall be issued (or denied) as soon as practicable. The SGA may issue a temporary Class III Gaming Enterprise License provided that the SGO has first issued a temporary finding of suitability to the applicant. The temporary finding of suitability and temporary license shall remain in effect until suspended, revoked or upon the issuance or denial of a finding of suitability. If the SGO denies issuance of a temporary finding of suitability, it shall notify the SGA setting forth the reason(s) for the denial in writing. Such denial shall not interrupt the processing of the application for a finding of suitability and license unless such application is withdrawn by the SGA or Nation Gaming Operation.

(k) Fee for License. Any enterprise filing an application for a Class III Gaming Enterprise License pursuant to this Section shall pay a fee sufficient to compensate the SGA and the SGO for the costs of investigating the license applications.

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Appendix E

Procedure for Investigation of Non-Class III Gaming Enterprises and Other Persons

Pursuant to the Nation-State Gaming Compact Between the Seneca Nation of Indians and the State of New York ("Compact"), this Appendix E sets forth below the procedure for investigation of a Non-Class III gaming enterprise and other persons:

- (a) Investigation of Non-Gaming Enterprises and Other Persons. Any enterprise or other person which provides goods, supplies or services to the Nation Gaming Operation other than Class III Gaming goods, supplies, services or equipment in a total amount exceeding the sum of \$75,000.00 in a single twelve month period shall be identified by the Nation Gaming Operation to the Seneca Gaming Authority ("SGA") and the State Gaming Officials ("SGO") and shall agree to cooperate with the SGA, the SGO and the law enforcement agency in any investigation deemed necessary by either such agency relative to the fitness of such person or enterprise to engage in business with the Nation Gaming Operation. The SGA may bar such person or enterprise from providing goods or services to the Nation Gaming Operation upon a determination that such person or enterprise or a principal thereof is a person or entity whose prior activities, criminal record, if any, or reputation, habits and associations pose a threat to the effective regulation of gaming or create or enhance the dangers of unfair or illegal practices, methods and activities in the conduct of gaming; provided, however, that such person or enterprise may appeal such determination in the

manner provided herein.

- (b) Non-Class III Gaming Registration. No enterprise or other person may provide Non-Class III Gaming service, Non-Class III Gaming supplies or equipment in excess of the amount limit specified in (a) above, to the Nation Gaming Operation unless such person or enterprise has applied for a Non-Class III Gaming Registration issued by the SGA. The Nation, as a governmental entity, is not subject to this registration requirement. A person or an enterprise need not be registered as provided herein so long as the identity of the person or enterprise together with the value and nature of services, supplies or equipment are provided to the SGA and the SGO the total amount does not exceed seventy-five thousand dollars (\$75,000) in a single twelve month period.

- (c) Procedure for Registration. Each applicant for a Non-Class III Gaming Registration shall, upon request, submit a completed Non-Class III Gaming Registration application to the SGA, on forms approved by the SGA and the SGO. The Nation Gaming Operation shall certify on said application that submission of the application has been approved. Such Non-Class III Gaming Registration application forms shall contain such information, documentation and assurances as may be required by the SGA and the SGO which shall identify all of said applicant's principals and which shall identify all of said applicant's and each such principal's personal and family history, personal and business references, criminal conviction record, business activities, financial affairs, prior gaming industry experience and

general education background; all of the foregoing as may be applicable to such applicant or such principal. For purposes of this Section, a principal includes: (a) each of an applicant's officers and directors; (b) each of an applicant's principal management employees, including any chief executive officer, chief financial officer, chief operating officer or general manager if such employees have responsibility for Class III Gaming related services to the Nation Gaming Operation; (c) each of an applicant's owners or partners if an unincorporated business; (d) each of an applicant's shareholders who owns more than five percent of the shares of the corporation if a corporation; and (e) each natural person other than a conventional lending institution who has provided financing for the enterprise constituting more than 10 percent of the total financing of the enterprise. Each completed Non-Class III Gaming Registration application submitted to the SGA pursuant to the provisions hereof, shall be accompanied by the State, Federal and, if applicable, Canadian fingerprint card(s) and photograph(s) of each principal of the applicant as required by the SGA and the SGO. The SGA shall forward the Non-Class III Gaming Registration application to the SGO. Promptly upon receipt of a completed Non-Class III Gaming Registration application, the SGO shall forward a copy thereof to the law enforcement agency for investigation.

- (d) Background Investigation of Applicants. Upon receipt of an application for a Non-Class III Gaming Registration, the SGO shall promptly cause State and Federal, and Canadian, if appropriate, criminal record checks to be

performed to determine whether the applicant or its principals has any criminal history. The SGO may direct the law enforcement agency to undertake such further investigation of the applicant and the applicant's principals as SGO deems appropriate and shall, as soon as practicable after completion of the registration investigation, report the results of such investigation to the SGO.

- (e) Action by SGO. Upon its receipt of a background investigation report from the law enforcement agency, SGO shall, within a reasonable amount of time, provide the SGA with a written report summarizing the information that it has obtained during the course of the background investigation. Such report shall state that the SGO considers the applicant either suitable or unsuitable for a Non-Class III Gaming Registration. SGO may report an applicant as unsuitable for a Non-Class III Gaming Registration only if the background investigation of the applicant reveals that the applicant, the enterprise or a principal of the enterprise:
- (1) has been convicted of a crime whose elements would constitute a felony under the laws of New York State or is punishable as a felony in another jurisdiction;
 - (2) has been convicted of any form of bookmaking or other form of illegal gambling;
 - (3) has been convicted of any fraud or material misrepresentation in connection with gaming;

- (4) has otherwise been determined to be a person whose prior activities, criminal record, if any, or reputation, habits and associations pose a threat to the effective regulation of gaming or create or enhance the chances of unfair or illegal practices, methods, and activities in the conduct of the Class III Gaming permitted pursuant to the Compact;
- (5) has failed to provide any information reasonably required to investigate the applicant for a Non-Class III Gaming Registration or to reveal any fact material to such application, or has furnished any information that is untrue or misleading in connection with such application; or
- (6) a principal of the applicant is under the age of 18.

In the event of a report that the SGO considers an applicant to be unsuitable, the SGO report shall set forth the specific reason(s) supporting such consideration.

- (f) Action by SGA. Only upon receipt of a report from SGO that indicates an applicant is suitable, the SGA, may, in its sole discretion pursuant to applicable Nation regulations, issue a Non-Class III Gaming Registration. SGA shall promptly notify SGO in writing of any Non-Class III Gaming Registration that it issues.
- (g) Suspension, Revocation or Denial of Renewal of Suitability Report for Non-Class III Gaming Registration.

SGA shall suspend, revoke or deny a renewal of any Non-Class III Gaming Registration if new information concerning facts arising, either prior to or since the issuance of the initial report of suitability, or any renewal thereof, comes to the attention of SGA and such information would have provided grounds under Section (e) to justify issuance of an initial report of unsuitability.

- (h) Notification of Applicant. In the event the SGO recommends an applicant to be unsuitable, the SGA will notify the applicant of such action in writing setting forth the reason(s) for said action. In the event the SGA denies, suspends, revokes or denies renewal of a Non-Class III Gaming Registration, the SGA will notify the applicant in writing of such denial, suspension, revocation or denial of renewal of a registration. The notification shall set forth the reason (s) for such action. The action of the SGA in denying a Non-Class III Gaming Registration or suspending, revoking or denying renewal of a Non-Class III Gaming Registration on the basis of Section (e) (1) or (e) (4) may, upon petition by the applicant, be reviewed by the Licensing Review Commission or such other governmental agency as may be created by the Nation for such purposes.

- (i) Review of Report of Unsuitability
 - (1) Pre-Report Review. In the event the SGO decides to issue a report of unsuitability with respect to an applicant, prior to issuance of such report, SGO shall notify SGA of such intention and the

provisions of Appendix C, Paragraph 10 (a) shall apply.

- (2) Felony Review Process. In addition to the review procedures set forth in Paragraph (h) above, applicants may seek review of a report of unsuitability as set forth in Appendix C, Paragraph 10(b), as such procedures may apply to it or its principals.

- (j) Duration of Registration and Renewal. Any Non-Class III Gaming Registration issued by the SGA shall be effective for two years from the date of issuance; provided, that a Non-Class III Gaming registered person or enterprise that has applied for renewal may continue to provide Non-Class III Gaming services under the expired Non-Class III Gaming Registration until final action is taken on the renewal application by the SGA and the SGO. Previously registered applicants or applicants for renewal shall provide currently updated application material with updated Federal and, if applicable, Canadian fingerprint card(s) but will not be required to re-submit historical data already on file with the SGA and the SGO. No additional investigation of an applicant for Non-Class III Gaming Registration renewal shall be required unless new information concerning the renewal applicant's continuing suitability or eligibility for a registration comes to the attention of the SGA or the SGO. Upon receipt of the Non-Class III Gaming Registration renewal application, the SGA shall forward it to the SGO. The SGO shall in turn forward the Non-Class III Gaming Registration renewal application to the law enforcement

agency for an updated background investigation if warranted based upon new information that comes to the attention of the SGA or the SGO concerning the registration renewal applicant's continuing suitability or eligibility for a Non-Class III Gaming Registration.

(k) Temporary Registration.

- (1) Each applicant for a Non-Class III Gaming Registration that files a copy of a current valid service industry registration issued by New Jersey, Nevada or Mississippi together with its completed application and fingerprint card(s) shall be issued a temporary report of suitability for purposes of a temporary Non-Class III Gaming Registration, pending determination of such applicant's suitability or eligibility for a Non-Class III Gaming Registration pursuant to this Section.

(2) Temporary Registration and Findings of Suitability.

The Nation Gaming Operation may request the SGA to issue a temporary Non-Class III Gaming Registration for any applicant. In that event, the SGA may request, in writing, the SGO to issue a temporary finding of suitability at the time of the submission of the application of applicant and application and fingerprint card(s) of applicant's principals to the SGO. The SGO shall issue a temporary finding of suitability for any applicant whose application discloses no grounds reasonably sufficient to disqualify it in the judgment of the SGO and the State fingerprint check does not

disclose grounds for denial of a finding of suitability. Such temporary finding of suitability shall be issued (or denied) as soon as practicable. The SGA may issue a temporary registration provided that the SGO has first issued a temporary finding of suitability to the applicant. The temporary finding of suitability and temporary registration shall remain in effect until suspended, revoked or upon the issuance or denial of a finding of suitability. If the SGO denies issuance of a temporary finding of suitability, it shall notify the SGA setting forth the reason(s) for the denial in writing. Such denial shall not interrupt the processing of the application for a finding of suitability and registration unless such application is withdrawn by the SGA or Nation Gaming Operation.

- (1) Fee for Registration. Any person or enterprise filing an application for a Non-Class III Gaming Registration pursuant to this Section shall pay a fee sufficient to compensate the SGA and the SGO for the costs of investigating the Non-Class III Gaming Registration applications.

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Appendix F

Chart of Accounts

Chart of Accounts, Generally

Contained within the Chart of Accounts are a variety of Account Titles that may be inapplicable in certain situations. For instance, if the Nation gaming operation is not conducted with a management contractor, some sections would be inapplicable. Likewise, there is a section regarding hotel revenues and expenses. Should the Nation Gaming Department or its manager not be affiliated with a hotel, this too would be inapplicable.

The Chart of Accounts contained herein shall be used as a model, setting forth the structure and detail reasonably required to prepare financial statements at the conclusion of each fiscal year presenting the financial position, results of operations, and changes in net worth and cash flow together with a comparison to the previous fiscal year and for use in the preparation of each annual audit. The following Chart of Accounts are illustrative only and should not be considered definitive or exclusive. However, the accounting structures shown are similar to those used in other commercial gaming activities nationally and should serve as the basis for developing specific accounts for games included in this Compact. The standards adopted in the Nation-State Compact must meet or exceed those of this illustrative Chart of Accounts.

The Nation or any enterprise of a Gaming Department operating under the authority of the Nation, shall maintain complete and accurate records of all transactions relating to the revenues and costs of the Gaming Department. All accounts shall be consistent with Generally Accepted Accounting Principles and provide for effective disclosure of financial information.

Description of the Uniform Chart of Accounts

This uniform chart of accounts shall be substantively followed by the Nation gaming operation.

- (a) Account classifications are included for all operating and administrative departments of the Nation gaming operation.
- (b) The accounts which are listed in the uniform chart of accounts are those required to meet the reporting requirements prescribed by the Compact and its appendices.
- (c) The Nation gaming operation may expand on the classifications as desired to meet its internal management accounting requirements.

Accounting Numbering System

- (a) The account numbering system is composed of a department code and an account code. The department code is used to identify all revenues, costs, and expenses to the responsible or benefitting department. Balance sheet accounts may be identified by a department code.
- (b) The department code is two digits, grouped as indicated below:

<u>Code Range</u>	<u>Department Type</u>
01 - 19	Casino
20 - 39	Rooms
40 - 59	Food and Beverage

60 - 78	Other Operating Departments
79	Rental, Concession, and Commission Income
80 - 98	Administrative Expenses and Fixed Charges
99	Other Revenue and Expenses

(c) The account code is four digits with the following basic structure:

<u>Code Range</u>	<u>Account Title</u>
1000 - 1999	Assets
2000 - 2899	Liabilities
2900 - 2999	Equity
3000 - 3999	Revenue and Allowances
4000 - 4999	Cost of Sales
5000 - 5999	Payroll and Related Expenses
6000 - 7999	Complimentary Services and Other Expenses
9000 - 9999	Other Revenues and Expenses

- (d) The Seneca Gaming Authority ("SGA") and the State Gaming Officials ("SGO") should be contacted in writing if there is any doubt as to which account number should be used to reflect a particular transaction or if there appears that no account number has been provided to reflect a particular transaction.

Uniform Chart of Accounts

The following is a listing of the account numbers and account titles broken dovm by general category. A definition of each account that should be utilized follows this listing.

Cash

1010	House banks and imprest change funds
1020	Casino cashier balance
1021	Casino cashier balance - contra account for other than cash assets
1030	Cash in banks
1040	Time deposits and certificates of deposit

Investments in Debt and Equity Securities

1110	Debt and equity securities - current
1120	Valuation allowance for current debt and equity securities

Receivables and Patrons' Checks

1210	Undeposited patrons' checks
1215	Collection notice patrons' checks
1220	Returned patrons' checks

1230 Allowance for uncollectible patrons' checks
1234 Non-gaming casino receivables
1236 Allowance for doubtful non-gaming casino accounts
1240 Hotel receivables
1250 Allowance for doubtful hotel accounts
1254 Food and beverage receivables

1256 Allowance for doubtful food and beverage accounts
1260 Receivables due from officers and employees
1280 Other receivables
1290 Allowance for doubtful accounts - other
receivables

Inventories

1310 Food inventories
1320 Beverage inventories
1380 Operating supplies inventories
1390 Other inventories

Prepaid Expenses

1402 Prepaid slot machine license fees
1410 Other prepaid licenses and permits
1430 Prepaid insurance
1440 Prepaid interest
1450 Prepaid rent
1490 Other prepaid expenses

Other Current Assets

1590 Other current assets

Investments, Advances, and Receivables

1610	Debt and equity securities - noncurrent
1615	Valuation allowance for noncurrent debt and equity securities
1670	Noncurrent receivables from officers and employees
1680	Other related party receivables
1690	Other long-term investments and receivables

Property and Equipment - Other

1702	Land
1706	Land improvements
1712	Buildings
1716	Building improvements
1722	Leased real property under capital leases
1726	Leasehold improvements
1728	Leased personal property under capital leases
1732	Construction in progress
1740	Buses
1742	Cars/Limos
1745	Other transportation equipment
1750	Furnishings and equipment
1760	Linen, silverware, china, and glassware
1790	Other property and equipment

Accumulated Depreciation and Amortization - Other Property and Equipment

1806	Accumulated depreciation - land improvements
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1812	Accumulated depreciation - buildings
1816	Accumulated depreciation - building improvements
1822	Accumulated amortization - leased real property under capital leases
1826	Accumulated amortization - leasehold improvements
1828	Accumulated amortization leased personal property under capital leases
1840	Accumulated depreciation - buses
1842	Accumulated depreciation - cars/limos
1845	Accumulated depreciation - other transportation equipment
1850	Accumulated depreciation - furnishings and equipment
1860	Accumulated depreciation - linen, silverware, china, and glassware
1890	Accumulated depreciation - other property and equipment

Other Assets

1902	Deposits
1904	Cash surrender value of life insurance
1910	Goodwill
1912	Deferred organization costs
1915	Deferred preopening costs
1918	Deferred licensing costs
1920	Deferred financing costs
1935	Other deferred charges
1950	Other assets

Accumulated Amortization of Other Assets

1960	Accumulated amortization - goodwill
1962	Accumulated amortization - organization costs
1965	Accumulated amortization - preopening costs
1968	Accumulated amortization - licensing costs
1970	Accumulated amortization - financing costs
1975	Accumulated amortization - other deferred charges
1990	Accumulated amortization - other assets

Accounts Payable

2020	Trade accounts payable - due to others
2050	Accounts payable - due to progressive gaming device trust funds
2080	Employee gratuities/tokes payable
2090	Other accounts payable

Notes Payable and Current Portion of Long-Term Debt

2120	Short-term notes payable to others
2190	Current portion of other long-term debt - due to others

Unredeemed Gaming Chips, Tokens, and Patrons' Deposits

2210	Table inventory
2220	Chips, and tokens in custody of the casino cashier
2230	Chips, and tokens issued - current series
2240	Chips, and tokens issued - reserve series
2250	Chips, and tokens on hand - reserve series
2260	Unredeemed gaming chips, and tokens - past series
2280	Patrons' deposits

Taxes Payable and Accrued

2310	Payroll taxes payable
2350	National Indian Gaming Commission assessment
2390	Other taxes payable

Other Accrued Expenses (Other than Due to Affiliates)

2410	Accrued salaries and wages
2420	Accrued bonuses
2430	Accrued pension/profit sharing contributions
2440	Accrued interest
2450	Accrued advertising
2460	Accrued rent
2480	Accrued progressive payout liability
2482	Unpaid keno tickets
2490	Other accrued expenses

Other Current Liabilities and Deferred Credits

2531	Due to management fee
2540	Due to officers and employees
2550	Due to related parties
2555	Estimated liability under deferred coupon programs
2560	Other current liabilities
2590	Current deferred income
2595	Other current deferred credits

Other Noncurrent Liabilities

2740	Due to officers and employees
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Gaming Department - Revenue from Table Games

10-3000	Baccarat
10-3010	Bang
10-3020	Beat The Dealer
10-3030	Best Poker Hand
10-3040	Blackjack
10-3050	Caribbean Stud Poker
10-3060	Chuck-a-luck
10-3070	Craps
10-3071	Gaming Devices
10-3080	Hazard
10-3090	Joker Seven
10-3100	Keno
10-3110	Let It Ride Poker
10-3120	Mini-Baccarat
10-3130	Pai Gow Poker
10-3140	Pai Gow Tiles
10-3150	Red Dog
10-3160	Roulette
10-3170	Sic Bo
10-3180	Super Pan Game
10-3190	Under and Over Seven
10-3200	Wheel Games
10-3201	Casino War
10-3202	Spanish Blackjack
10-3203	Multi Action Blackjack
10-3204	Three Card Poker

Gaming Department - Revenue from Slot Machines and Other
Devices

10-3210 0.05 non-progressive other Gaming Devices
10-3220 0.10 non-progressive other Gaming Devices
10-3230 0.25 non-progressive other Gaming Devices
10-3240 0.50 non-progressive other Gaming Devices
10-3250 1.00 non-progressive other Gaming Devices
10-3260 5.00 non-progressive other Gaming Devices
10-3270 25.00 non-progressive other Gaming Devices
10-3280 Other non-progressive other Gaming Devices

10-3290 0.05 progressive other Gaming Devices
10-3300 0.10 progressive other Gaming Devices
10-3310 0.25 progressive other Gaming Devices
10-3320 0.50 progressive other Gaming Devices
10-3330 1.00 progressive other Gaming Devices
10-3340 5.00 progressive other Gaming Devices
10-3350 25.00 progressive other Gaming Devices
10-3360 Other progressive other Gaming Devices
10-3410 0.05 non-progressive slot machines
10-3420 0.10 non-progressive slot machines
10-3430 0.25 non-progressive slot machines
10-3440 0.50 non-progressive slot machines
10-3450 1.00 non-progressive slot machines
10-3460 5.00 non-progressive slot machines
10-3470 25.00 non-progressive slot machines
10-3480 Other non-progressive slot machines

10-3490 0.05 progressive slot machines
10-3500 0.10 progressive slot machines
10-3510 0.25 progressive slot machines
10-3520 0.50 progressive slot machines
10-3530 1.00 progressive slot machines
10-3540 5.00 progressive slot machines
10-3550 25.00 progressive slot machines
10-3560 Other progressive slot machines

Gaming Department -Revenue Adjustments and other income

- 10-3880 Revenue Adjustment for Progressive Payout Accrual
- 10-3890 Other Income

Gaming Department -Payroll and Related Expenses

- 10-5100 Salaries and wages -other employees
- 10-5200 Salaries and wages -officers
- 10-5500 Payroll taxes and benefits

Gaming Department -Other Expenses

- 10-6000 Cash overages and shortages
- 10-6100 Junket fees

Gaming Department -Complimentary Services

- 10-6210 Rooms
- 10-6220 Food
- 10-6221 Coupon redemption food
- 10-6230 Beverage
- 10-6231 Coupon redemption beverage
- 10-6240 Travel
- 10-6245 Coupon redemption cash and tokens
- 10-6250 Other
- 10-6251 Coupon redemption -other

Gaming Department -Licenses and Taxes

- 10-6320 Gaming devices fees

10-6390 Other licenses

Gaming Department - Tournaments/Promotions

10-7010 Tournament prizes
10-7020 Promotional prizes
10-7030 Cost associated with promotions

Gaming Department - Other operating expenses

10-7900 Other operating expenses
10-7910 Casino management fees
10-7920 Operating supplies
10-7930 Provision for uncollectible patrons' checks
10-7940 Provision for uncollectible non-gaming casino accounts
10-7950 Progressive gaming device trust fund expenses
10-7960 Gains (losses) on foreign currency transactions

Rooms - Revenue and Allowances

20-3200 Rooms revenue
20-3290 Complimentary rooms revenue
20-3900 Allowances on rooms revenue

Rooms - Payroll and Related Expenses

20-5100 Salaries and wages - other employees
20-5200 Salaries and wages - officers
20-5500 Payroll taxes and benefits

Rooms - Complimentary Services

20-6210	Rooms
20-6220	Food
20-6221	Coupon redemption food
20-6230	Beverage
20-6231	Coupon redemption beverage
20-6240	Travel
20-6245	Coupon redemption cash and tokens
20-6250	Other
20-6251	Coupon redemption - other

Rooms - Other Expenses

20-6600	Provision for doubtful accounts
20-7900	Other operating expenses

Food and Beverage - Revenue and Allowances

40-3300	Food sales
40-3390	Complimentary food sales
40-3400	Beverage sales
40-3490	Complimentary beverage sales
40-3890	Other income
40-3910	Allowances on food sales
40-3920	Allowances on beverage sales

Food and Beverage - Cost of Sales

40-4300	Cost of food consumed
40-4350	Cost of employees' meals
40-4400	Cost of beverage sales

Food and Beverage - Payroll and Related Expenses

40-5100 Salaries and wages - other employees
40-5200 Salaries and wages - officers
40-5500 Payroll taxes and benefits

Food and Beverage - Complimentary Services

40-6210 Rooms
40-6220 Food
40-6221 Coupon redemption food
40-6230 Beverage
40-6231 Coupon redemption beverage
40-6240 Travel
40-6245 Coupon redemption cash and tokens
40-6250 Other
40-6251 Coupon redemption - other

Food and Beverage - Other Expenses

40-6300 Licenses and fees
40-6600 Provision for doubtful accounts
40-7900 Other operating expenses

Miscellaneous profit centers

50-1000 Telephone department
50-2000 Garage and parking lot
50-3000 Guest laundry
50-4000 Swimming pool
50-5000 Tennis courts
50-6000 Game room

50-7000 Gift shop
50-8000 Package liquor store

Other Operating Departments - Revenue and Allowances

60-3500 Revenue from services
60-3530 Complimentary services - travel
60-3540 Complimentary services - other
60-3550 Sales of merchandise
60-3590 Complimentary sales of merchandise
60-3900 Allowances

Other Operating Departments - Cost of Sales

60-4550 Cost of merchandise sold

Other Operating Departments - Payroll and Related Expenses

60-5100 Salaries and wages - other employees
60-5200 Salaries and wages - officers
60-5500 Payroll taxes and benefits

Other Operating Departments - Complimentary Services

60-6210 Rooms
60-6220 Food
60-6221 Coupon redemption food
60-6230 Beverage
60-6231 Coupon redemption beverage
60-6240 Travel
60-6245 Coupon redemption cash and tokens
60-6250 Other
60-6251 Coupon redemption other

Other Operating Departments - Other Expenses

60-7900 Other operating expenses

Rental, Concession and Commission - Revenue and Allowances

79-3810 Space rentals
79-3820 Concessions
79-3830 Commissions
79-3840 Vending machine income
79-3850 Cash discounts earned
79-3890 Other operating income

Executive Department - Payroll and Related Expenses

81-5100 Salaries and wages - other employees
81-5200 Salaries and wages - officers
81-5500 Payroll taxes and benefits

Executive Department - Complimentary Services

81-6210 Rooms
81-6220 Food
81-6221 Coupon redemption food
81-6230 Beverage
81-6231 Coupon redemption beverage
81-6240 Travel
81-6245 Coupon redemption cash and tokens
81-6250 Other
81-6251 Coupon redemption other

Executive Department - Other Expenses

81-6401 Facility management fees - other
81-6920 Directors' fees
81-6940 Other contributions
81-7900 Other operating expenses

Accounting and Auditing - Payroll and Related Expenses

82-5100 Salaries and wages - other employees
82-5200 Salaries and wages - officers
82-5500 Payroll taxes and benefits

Accounting and Auditing - Complimentary Services

82-6210 Rooms
82-6220 Food
82-6221 Coupon redemption food
82-6230 Beverage
82-6231 Coupon redemption beverage
82-6240 Travel
82-6245 Coupon redemption cash and tokens
82-6250 Other
82-6251 Coupon redemption - other

Accounting and Auditing - Other Expenses

82-7900 Other operating expenses

Security - Payroll and Related Expenses

84-5100 Salaries and wages - other employees
84-5200 Salaries and wages - officers
84-5500 Payroll taxes and benefits

Security -Complimentary Services

84-6210 Rooms
84-6220 Food
84-6221 Coupon redemption food
84-6230 Beverage
84-6231 Coupon redemption beverage
84-6240 Travel
84-6245 Coupon redemption cash and tokens
84-6250 Other
84-6251 Coupoon redemption - other

Security -Other Expenses

84-7900 Other operating expenses

Other Administrative and General Departments -Payroll and Related Expenses

89-5100 Salaries and wages -other employees
89-5200 Salaries and wages -officers
89-5500 Payroll taxes and benefits

Other Administrative and General Departments - Complimentary Services

89-6210 Rooms
89-6220 Food
89-6221 Coupon redemption food
89-6230 Beverage
89-6231 Coupon redemption beverage
89-6240 Travel

89-6245 Coupon redemption cash and tokens
89-6250 Other
89-6251 Coupon redemption - other

Other Administrative and General Departments Expenses Other

89-6600 Provision for doubtful accounts
89-7750 General insurance - officers' life
89-7751 General insurance - other
89-7900 Other operating expenses

Marketing - Payroll and Related Expenses

90-5100 Salaries and wages - other employees
90-5200 Salaries and wages - officers
90-5500 Payroll taxes and benefits

Marketing - Complimentary Services

90-6210 Rooms
90-6220 Food
90-6221 Coupon redemption food
90-6230 Beverage
90-6231 Coupon redemption beverage
90-6240 Travel
90-6245 Coupon redemption cash and tokens
90-6250 Other
90-6251 Coupon redemption - other

Marketing - Other Expenses

90-7210 Sales expenses

Marketing - Advertising Expenses

90-7220 Newspaper and magazine
90-7221 Television and radio
90-7222 Outdoor and billboard
90-7223 Direct mail
90-7224 Production and art work
90-7225 Other
90-7230 Air charter and flight program expenses
90-7235 Bus subsidy expenses
90-7240 Public relations and publicity
90-7260 Fees and commissions - marketing
90-7900 Other operating expenses

Guest Entertainment - Revenue

91-3710 Cover charges

Guest Entertainment - Payroll and Related Expenses

91-5100 Salaries and wages - other employees
91-5200 Salaries and wages - officers
91-5500 Payroll taxes and benefits

Guest Entertainment - Complimentary Services

91-6210 Rooms
91-6220 Food
91-6221 Coupon redemption food
91-6230 Beverage

91-6231 Coupon redemption beverage
91-6240 Travel
91-6245 Coupon redemption cash and tokens
91-6250 Other
91-6251 Coupon redemption - other

Guest Entertainment -Other Expenses

91-7300 Contract entertainment
91-7900 Other operating expenses

Property, Operation and Maintenance -Payroll and Related Expenses

92-5100 Salaries and wages -other employees
92-5200 Salaries and wages -officers
92-5500 Payroll taxes and benefits

Property, Operation and Maintenance Complimentary Services

92-6210 Rooms
92-6220 Food
92-6221 Coupon redemption food
92-6230 Beverage
92-6231 Coupon redemption beverage
92-6240 Travel
92-6245 Coupon redemption cash and tokens
92-6250 Other
92-6251 Coupon redemption - other

Property, Operation and Maintenance -Other Expenses

92-7900 Other operating expenses

Utilities

93-7410 Electricity
93-7420 Fuel - gas
93-7421 Fuel - oil
93-7422 Fuel - other
93-7430 Water
93-7435 Waste removal
93-7440 Sewage
93-7450 Other energy costs

Rent, Municipal Charges, and Insurance

94-7500 Rent
94-7610 Property tax expense
94-7700 Insurance on building and contents

Interest Expense

95-6850 Interest expense - other

Depreciation and Amortization

96-7800 Depreciation and amortization of property and
equipment and other assets

Other Revenue and Expense - Nonoperating Income and
Expenses

99-9100 Interest income

99-9110	Dividend income
99-9120	Gains (losses) on disposal of property
99-9130	Realized gains (losses) on debt and equity securities
99-9150	Unrealized holding gains (losses) on debt and equity securities
99-9400	Miscellaneous income
99-9500	Miscellaneous expenses

Other Revenue and Expense - Extraordinary Items and Accounting Changes

99-9600	Extraordinary credits
99-9700	Extraordinary charges
99-9800	Cumulative effect of accounting changes

<u>ASSETS</u>		
Number	Account Title	Text of Accounts
Cash		
1010	House banks and imprest change funds	This account shall include all change funds maintained by the cashiers in the various departments of the Nation gaming operation, including front desk, and food and beverage, but excluding the casino cashiers.
1020	Casino cashier balance	This account shall include the total balance of the casino cashier for all types of assets and liabilities, including cash, undeposited patrons' checks, chips, tokens and patrons' deposits.
1021	Casino cashier balance - contra account for other than cash assets	This account shall be used at the end of each accounting period to distribute the total balance to the correct balance sheet accounts. Undeposited patrons' checks, gaming chips, and tokens on hand, and patrons' deposits must all be distributed to the correct accounts. The entry made to this account will result in the net difference between accounts 1020 and 1021 being cash in the custody of the casino cashier. The balance in this account shall be reversed as of the beginning of each accounting period.

1030	Cash in banks	This account shall include all unrestricted demand deposits in banks.
1040	Time deposits and certificates of deposit	This account shall include all interest earning deposits with banks and savings and loan associations.
Investments in Debt and Equity Securities		
1110	Debt and equity securities - current	This account shall include the aggregate cost of all debt and equity securities.
1120	Valuation allowance for current debt and equity securities	This account shall include the accumulated allowance necessary to reduce the aggregate carrying value of current debt and equity securities from cost to market value.
1210	Undeposited patrons' checks	This account shall include the total amount of patrons' checks, representing outstanding counter checks and personal checks being held, pending initial deposit by the casino cashier.
1215	Collection notice patrons' checks Returned patrons' checks	This account shall include the total amount of patrons' checks which have been deposited on collection notices.
1220		This account shall include the total amount of patrons' checks held by the accounting department which have been previously deposited but returned by the bank as uncollected.

1230	Allowance for uncollectible patrons' checks	This account shall include the estimated amount of patrons' checks currently held, as either undeposited or returned, which will ultimately be uncollectible.
1234	Non-Gaming Department receivables	This account shall include the total amounts due from patrons for non-gaming receivables in the Gaming Department department.
1236	Allowance for doubtful non-Gaming Department accounts	This account shall include the estimated amount of non-Gaming Department receivables which will ultimately be uncollectible.
1240	Hotel receivables	This account shall include the total amounts due to the Nation gaming operation for accounts maintained in the guest and city ledgers. Receivables relative to rental, concession, and commission income shall be included in account 1280.
1250	Allowance for doubtful hotel accounts	This account shall include the estimated amount of the hotel receivables which will ultimately be uncollectible.
1254	Food and beverage receivables	This account shall include total amounts due to the Nation gaming operation from patrons of the food and beverage facilities other than accounts maintained in the guest ledgers.

1256	Allowance for doubtful food and beverage accounts	This account shall include the estimated amount of food and beverage receivables which will ultimately be uncollectible.
1260	Receivables due from officers and employees	This account shall include the total amounts due as notes (current portion) and accounts receivable from officers and employees of the Nation gaming operation.
1280	Other receivables	This account shall include all receivable amounts currently due, not specifically included in accounts 1210, 1220, 1234, 1240, 1254, 1260 and 1270.
1290	Allowance for doubtful accounts -other receivables	This account shall include the estimated amount of uncollectible receivables, other than allowances provided in accounts 1230, 1236, 1250, and 1256.
Inventories		
1310	Food inventories	This account shall include the cost of food held in inventory.
1320	Beverage inventories	This account shall include the cost of alcoholic and soft drink inventories.

1380	Operating supplies inventories	This account shall include the cost of the reserve stock of all operating supplies, including but not limited to items such as cleaning supplies, guest supplies, and paper goods.
1390	Other inventories	This account shall include all inventories n included in accounts 1310, 1320, and 1380.
Prepaid Expenses ot		
1402	Prepaid gaming device revenue share	This account shall include the unamortized prepaid amounts of the gaming device revenue share.
1410	Other prepaid licenses and permits	This account shall include the unamortized prepaid amounts for all licenses other than the gaming devices fees.
1430	Prepaid insurance	This account shall include all unamortized prepaid amounts of insurance premiums.
1440	Prepaid interest	This account shall include all unamortized prepaid amounts of interest payments.
1450	Prepaid rent	This account shall include all unamortized prepaid amounts of rent payments.
1490	Other prepaid expenses	This account shall include all unamortized prepaid amounts, other than licenses and permits, insurance, interest, and rent.
Other Current Assets		

1590	Other current assets	This account shall include all other assets not provided for in accounts 1000 through 1490, which are reasonably expected to be converted to cash or consumed in the operations of the Nation gaming operation within one year.
Investments, Advances, and Receivables		
1610	Debt and equity securities - noncurrent	This account shall include the aggregate cost of all debt and equity securities which are specifically intended to be held for a period greater than one year. Any current amounts shall be included in account 1110.
1615	Valuation allowance for noncurrent debt and equity securities	This account shall include the accumulated allowance necessary to reduce the aggregate carrying value of noncurrent debt and equity securities from cost to market value. Any current amounts shall be included in account 1120.

1670	Noncurrent receivables from officers and employees	This account shall include all amounts due as notes (non-current portion) and accounts receivable to the Nation gaming operation from officers and employees for a period extending beyond one year. Any current amounts shall be included in account 1260.
1680	Other related party receivables	This account shall include all amounts due as notes (non-current portion) and accounts receivable to the Nation gaming operation from related parties for a period extending beyond one year. Any current amounts shall be included in account 1280.
1690	Other long-term investments and receivables	This account shall include the amounts for all noncurrent investments and receivables other than those provided for in accounts 1610-1670.
<u>Property and Equipment - Other</u>		
1702	Land	This account shall include the cost of all investments in land.
1706	Land improvements	This account shall include the cost of improvements to land.
1712	Buildings	This account shall include the cost of buildings.
1716	Building improvements	This account shall include the cost of improvements to buildings.

1722	Leased real property under capital leases	This account shall include the carrying value of real property under capital leases.
1726	Leasehold improvements	This account shall include the cost of improvements made to leased property.
1728	Leased personal property under capital leases	This account shall include the carrying value of all personal property under capital leases. Included in the account are items such as automotive equipment, computer hardware, and restaurant equipment.
1732	Construction in progress	This account shall include the accumulated cost of property.
1740	Buses	This account shall include the cost of all buses which are not under capital leases.
1742	Cars/Limousines	This account shall include the cost of all cars/limousines which are not under capital leases.
1745	Other transportation equipment	This account shall include the cost of all transportation equipment, other than buses and cars/limousines, which are not under capital leases.
1750	Furnishings and equipment	This account shall include the cost of all furnishings and equipment other than transportation equipment, which are not under capital leases.
1760	Linen, silverware, china, and glassware	This account shall include the cost of linen, silverware, china, and glassware.

1790	Other property and equipment	This account shall include the cost of all property and equipment not specifically included in accounts 1702 through 1760.
Accumulated Depreciation and Amortization - Other		
Property and Equipment		
1806	Accumulated depreciation - land improvements	
1812	Accumulated depreciation - buildings	
1816	Accumulated depreciation - building improvements	
1822	Accumulated amortization - leased real property under capital leases	
1826	Accumulated amortization - leasehold improvements	
1828	Accumulated amortization - leased personal property under capital leases	
1840	Accumulated depreciation - buses	
1842	Accumulated depreciation - cars/limos	
1845	Accumulated depreciation - other transportation equipment	
1850	Accumulated depreciation - furnishings and equipment	

1860	Accumulated depreciation - linen, silverware, china, and glassware	
1890	Accumulated depreciation - other property and equipment	
Other Assets		
1902	Deposits	This account shall include security and miscellaneous deposits with others.
1904	Cash surrender value of life insurance	This account shall include the current surrender value of insurance policies on the lives of officers and others under which the Nation gaming operation is the beneficiary.
1910	Goodwill	This account shall include the excess purchase price paid over the fair market value of the net assets acquired in a business combination. Amortization of this excess should be credited to account 1960.
1912	Deferred organization costs	This account shall include all deferred costs such as legal fees and incorporation fees, related to the initial organization of the Nation gaming operation. Amortization of these costs should be credited to account 1962.

1915	Deferred preopening costs	This account shall include any preopening costs which may be deferred, such as systems development, employee recruitment and training, etc., and are being amortized over a period exceeding one year. Amortization of these costs should be credited to account 1965.
1918	Deferred licensing costs	This account shall include any licensing cost which may be deferred and are being amortized over a period exceeding one year. Amortization of these costs should be credited to account 1968.
1920	Deferred financing costs	This account shall include costs associated with the issuance of long-term debt. Amortization of these costs should be credited to account 1970.
1935	Other deferred charges	This account shall include the charges for services and expenses which have been incurred but are expected to benefit future periods. Amortization of these charges should be credited to account 1975.

1950	Other assets	This account shall include all assets not provided for in accounts 1600 through 1949. Items such as franchises, patents, and the cost of salable or transferable licenses shall be included in this account. Amortization of these charges, if required, should be credited to account 1990.
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Accumulated Amortization of Other Assets

1960	Accumulated amortization - goodwill	
1962	Accumulated amortization - organization costs	
1965	Accumulated amortization - preopening costs	
1968	Accumulated amortization - licensing costs	
1970	Accumulated amortization - financing costs	
1975	Accumulated amortization - other deferred charges	
1990	Accumulated amortization - other assets	

LIABILITIES

Number	Account Title	Text of Accounts
Accounts Payable		
2020	Trade accounts payable - due to others	This account shall include all amounts due to others for services or purchases of items such as food and beverage inventories, supplies, and equipment.
2050	Accounts payable - due to progressive gaming device trust funds	This account shall include all amounts currently payable to progressive gaming device trust funds
2080	Employee gratuities/tokens payable	This account shall include all amounts collected by the Nation gaming operation but payable to employees as gratuities/tokens from guests and patrons.
2090	Other accounts payable	This account shall include any amounts payable to vendors for services or purchases which are not specifically provided for in accounts 2020, 2050 and 2080.
Notes Payable and Current Portion of Long-Term Debt		
2120	Short-term notes payable to others	This account shall include all amounts payable by the licensee to others on notes with original maturities of one year or less.
2190	Current portion of other long-term debt - due to others	This account shall include all amounts due within the next twelve months on debt obligations due to others, other than amounts included in account 2120.
Unredeemed Gaming Chips and Patrons' Deposits		
2210	Table inventory	This account shall include the total "face value" of chips on the gaming tables. The "face value" is defined as the amount for which chips are redeemed in cash.

2220	Chips and tokens in custody of the casino cashier	This account shall include the total "face value" of chips and tokens in the custody of the casino cashier. This amount shall be recorded at the end of each accounting period as a reclassification of the balance maintained in account 1020. A reversing entry shall be made at the beginning of each accounting period. The offsetting account for the entries described above shall be account 1021.
2230	Chips and tokens issued - current series	This account shall include the total "face value" of the chip and token series currently in use by the Nation gaming operation. This account shall represent the amount of chips and tokens placed in circulation rather than those remaining on hand (accounts 2210 and 2220).
2240	Chips and tokens issued - reserve series	This account shall represent the total "face value" of any series of chips and tokens purchased by the Nation gaming operation but held as a backup or reserve for the series currently in use.
2250	Chips and tokens on hand - reserve series	This account shall represent the total "face value" of reserve series of chips and tokens which are in the custody of the Nation gaming operation. Normally the balance in this account is equal to the balance in account 2240.
2260	Unredeemed gaming chips and tokens - past series	This account shall represent the net liability for past series of chips and tokens which are no longer in use by the Nation gaming operation, but are still outstanding with patrons, and have not been credited to income.
2280	Patrons' deposits	This account shall include all amounts on deposit by patrons with the casino cashier.

Taxes Payable and Accrued

2310	Payroll taxes payable	This account shall include the liability for payroll taxes for both employee withholdings and employer payroll taxes.
2350	National Indian Gaming Commission assessment	This account shall include the assessment due annually to the National Indian Gaming Commission for the regulation of Class III gaming.
2390	Other taxes payable	This account shall include any amounts currently payable for tax liabilities which are not specifically provided for in accounts 2310 through 2365.
Other Accrued Expenses (Other than Due to Affiliates)		
2410	Accrued salaries and wages	This account shall include all amounts accrued as expenses, but not yet paid to employees and officers for salaries and wages.
2420	Accrued bonuses	This account shall include all amounts accrued as expenses, but not yet paid to employees and officers for bonuses.
2430	Accrued pension contributions	This account shall include all amounts accrued as expenses, but not yet paid to pension funds as contributions.
2440	Accrued interest	This account shall include all amounts accrued as expenses, but not yet paid to lenders for interest.
2450	Accrued advertising	This account shall include all amounts accrued as expenses, but not yet paid to advertisers for advertising.
2460	Accrued rent	This account shall include all amounts accrued as expenses, but not yet paid to landlords for rent.
2480	Accrued progressive payout liability	This account shall include the accrued liability for progressive gaming device and table game jackpot payouts.

2482	Unpaid keno tickets	This account shall include the accrued liability for unpaid keno tickets.
2490	Other accrued expenses	This account shall include all accrued liability amounts for expenses not specifically provided for in accounts 2410 through 2482.
Other Current Liabilities and Deferred Credits		
2531	Due to management fee	This account shall include all amounts payable for management fees due within the next twelve months.
2540	Due to officers and employees	This account shall include all amounts payable to officers and employees within the next twelve months.
2550	Due to related parties	This account shall include all amounts payable to related parties within the next twelve months.
2555	Estimated liability under deferred coupon programs	This account shall be credited with the cost of deferred coupons estimated to be redeemed at a later date for cash, goods, or services. The contra entry shall be charged to account 1590, other current assets.
2560	Other current liabilities	This account shall include all current liabilities not specifically provided for in accounts 2020 through 2555.
2590	Current deferred income	This account shall include the amount of any income which has been received but is attributable to accounting periods within the next twelve months.
2595	Other current deferred credits	This account shall include the amounts for all current deferred credits not included in account 2590.
Non-current Liabilities		

2740	Due to officers and employees	This account shall include all amounts due to officers and employees beyond the next twelve months. Any current amounts shall be included in account 2540.
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GAMING DEPARTMENT

Number	Account Title	Text of Accounts
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Revenue from Table Games		
10-3000	Baccarat	
10-3010	Bang	
10-3020	Beat the Dealer	
10-3030	Best Poker Hand	
10-3040	Blackjack	
10-3050	Caribbean Stud Poker	
10-3060	Chuck-a-luck	
10-3070	Craps	
10-3071	Gaming devices	
10-3080	Hazard	
10-3090	Joker Seven	
10-3100	Keno	
10-3110	Let It Ride Poker	
10-3120	Mini-Baccarat	
10-3130	Pai Gow Poker	
10-3140	Pull-Tabs	
10-3150	Red Dog	
10-3160	Roulette	

10-3170	Sic Bo	
10-3180	Super Pan Game	
10-3190	Under and Over Seven	
10-3200	Wheel Games	
10-3201	Casino War	
10-3202	Spanish Blackjack	
10-3203	Multi Action Blackjack	
10-3204	Three Card Poker	

Revenue from Slot Machines and Other Devices

Number	Account Title	Text of Account
10-3210	0.05 non-progressive other Gaming Devices	
10-3220	0.10 non-progressive other Gaming Devices	
10-3230	0.25 non-progressive other Gaming Devices	
10-3240	0.50 non-progressive other Gaming Devices	
10-3250	1.00 non-progressive other Gaming Devices	
10-3260	5.00 non-progressive other Gaming Devices	
10-3270	25.00 non-progressive other Gaming Devices	
10-3280	Other non-progressive other Gaming Devices	
10-3390	0.05 progressive other Gaming Devices	
10-3300	0.10 progressive other Gaming Devices	

10-3310	0.25 progressive other Gaming Devices
10-3320	0.50 progressive other Gaming Devices
10-3330	1.00 progressive other Gaming Devices
10-3340	5.00 progressive other Gaming Devices
10-3350	25.00 progressive other Gaming Devices
10-3360	Other progressive other Gaming Devices
10-3410	0.05 non-progressive slot machine
10-3420	0.10 non-progressive slot machine
10-3430	0.25 non-progressive slot machine
10-3440	0.50 non-progressive slot machine
10-3450	1.00 non-progressive slot machine
10-3460	5.00 non-progressive slot machine
10-3470	25.00 non-progressive slot machine
10-3480	Other non-progressive slot machine
10-3490	0.05 progressive slot machine
10-3500	0.10 progressive slot machine
10-3510	0.25 progressive slot machine
10-3520	0.50 progressive slot machine

10-3530	1.00 progressive slot machine		
10-3540	5.00 progressive slot machine		
10-3550	25.00 progressive slot machine		
10-3560	Other progressive slot machine		
Revenue adjustments and other income			
10-3880	Revenue adjustment for progressive jackpot accrual		This account shall be charged or credited with the amount necessary to adjust accrued progressive payout liability (account 2480) to the current liability amount.
10-3890	Other Income		This account shall be credited with any other income directly attributable to the Gaming Department, including write-offs of unredeemed gaming chips and tokens.
GAMING DEPARTMENT			
Gaming Department - Payroll and Related Expenses			
10-5100	Salaries and wages - other employees		This account shall be charged with all salaries and wages and bonus payments for employees of the Gaming Department who are not officers of the Nation gaming operation. This category of expense includes overtime premium, holiday, vacation, and sick pay. Included in this group of employees shall be Gaming Department managers, shift managers, pit managers, floormen, dealers, gaming device employees, and employees in the cashiers' cage.
10-5200	Salaries and wages - officers		This account shall be charged with all salaries and wages and bonus payments for employees of the Gaming Department who are also officers of the Nation gaming operation.

10-5500	Payroll taxes and benefits	This account shall be charged with all payroll taxes, workers' compensation, group insurance, employee meals, and other payroll benefit expenses attributable to employees of the Gaming Department department.
Gaming Department - Other Expenses		
10-6000	Cash overages and shortages	This account shall be charged and credited with all overages and shortages of the casino cashiers.
10-6100	Junket fees	This account shall be charged with all amounts paid to authorized junket representatives for attracting patrons to the Nation gaming operation's facility.
Gaming Department - Complimentary Services		
10-6210	Complimentary services - rooms	This account shall be charged with the retail value of all complimentary hotel rooms authorized by the management of the Gaming Department.
10-6220	Complimentary services - food	This account shall be charged with the retail value of complimentary meals authorized by the management of the Gaming Department other than amounts charged to account 10-6221.
10-6221	Complimentary services - coupon redemption food	This account shall be charged with the retail value of complimentary food attributable to coupon redemptions authorized by the management of the Gaming Department. This account shall apply to coupon redemption programs which entitle patrons to redeem coupons for complimentary food.
10-6230	Complimentary services - beverage	This account shall be charged with the retail value of complimentary beverages authorized by the management of the Gaming Department other than amounts charged to account 10-6231.

10-6231	Complimentary services - coupon redemption beverage	This account shall be charged with the retail value of complimentary beverages attributable to coupon redemptions authorized by the management of the Gaming Department. This account shall apply to coupon redemption programs which entitle patrons to redeem coupons for complimentary beverages.
10-6240	Complimentary services - travel	This account shall be charged with the cost of any complimentary travel authorized by the management of the Gaming Department. Included in these amounts shall be the cost of ground transportation, chartered aircraft, chartered seacraft, and airline tickets.
10-6245	Complimentary services - coupon redemption cash and tokens	This account shall be charged with the value of coupons redeemed for cash and tokens authorized by the management of the Gaming Department. This account shall apply to coupon redemption programs which entitle patrons to redeem coupons for complimentary cash or tokens including, but not limited to, bus coupons.
10-6250	Complimentary services - other	This account shall be charged with the retail value of other complimentary goods and services which were credited as complimentary revenue to other operating departments and with the cost of all other complimentary good and services, other than amounts charged to accounts 10-6210 through 10-6245 and 10-6251, authorized by the management of the Gaming Department.

10-6251	Complimentary services - coupon redemption - other	This account shall be charged with the retail value of coupons redeemed for other complimentary goods and services which were credited as complimentary revenue to other operating departments and with the cost of all other coupons redeemed for other complimentary goods and services, other than amounts charged to accounts 10-6221, 10-6231, and 10-6245, authorized by the management of the Gaming Department.
Licenses and Contribution		
10-6320	Slot machine and other device revenue share contribution	This account shall be charged with the monthly amortization of the annual Gaming device revenue share.
10-6390	Other licenses and taxes	This account shall be charged with all amounts paid or payable as licenses and taxes relative to the Gaming Department operations and not specifically provided for in account 10-6320.
Tournaments/Promotions		
10-7010	Tournament prizes	This account shall be charged with all amounts paid as tournament prizes.
10-7020	Promotional prizes	This account shall be charged with all amounts paid as promotional prizes. Examples of such items include drawings and give-aways.
10-7030	Cost associated with promotions	This account shall be charged with costs associated with promotions. Examples of such items include materials, equipment, displays, and labor.

Gaming Department - Other Operating Expenses

10-7900	Other operating expenses	This account shall be charged with all other expenses directly attributable to the Gaming Department. Examples of items to be included are uniforms, employee travel expenses, and dry cleaning.
10-7910	Gaming Department management fees	This account shall be charged with all fees paid under management contracts for the Gaming Department operation.
10-7920	Operating supplies	This account shall be charged with the cost of all operating supplies used in the Gaming Department. Included shall be the cost of playing cards, chips, dealing shoes, dice, etc.
10-7930	Provision for uncollectible patrons' checks	This account shall be charged with the estimated amount of uncollectible patrons' checks accepted during the period. The contra entry shall be to account 1230, allowance for uncollectible patrons' checks.
10-7940	Provision for uncollectible, non-gaming Gaming Department accounts	This account shall be charged with the estimated amount of uncollectible non-gaming Gaming Department receivables. The contra entry will be to account 1236, allowances for doubtful non-gaming Gaming Department accounts.
10-7950	Progressive gaming device trust fund expenses	This account shall be charged with all amounts paid to operate progressive gaming device trust funds.
10-7960	Gains (losses) on foreign currency transactions	This account shall reflect the effects of rate changes required to be included in determining current net income.

ROOMS		
Rooms - Revenue and Allowance		
Number	Account Title	Text of Accounts
20-3200	Rooms revenue	This account shall be credited with all revenue derived by the Nation gaming operation from the rental of guest rooms. Any revenue derived from the rental of public rooms shall be included in account 40-3890, other food and beverage income.
20-3290	Complimentary rooms revenue	This account shall be credited with the retail value of all hotel rooms provided to patrons and guests of the Nation gaming operation.
20-3900	Allowances on rooms revenue	This account shall be charged with all allowances granted against previously recorded rooms revenue.
Rooms - Payroll and Related Expenses		
20-5100	Salaries and wages - other employees	This account shall be charged with all salaries and wages and bonus payments for employees of the rooms department who are not officers of the Nation gaming operation. This category of expense includes overtime premium, holiday, vacation, and sick pay. Examples of employees who shall be charged to this account are room managers, front desk employees, housekeeping employees, bellmen, and reservation employees.
20-5200	Salaries and wages - officers	This account shall be charged with all salaries and wages and bonus payments for employees of the rooms department who are also officers of the Nation gaming operation.

20-5500	Payroll taxes and benefits	This account shall be charged with all payroll taxes, workers' compensation, group insurance, employee meals, and other payroll benefit expenses attributable to employees of the rooms department.
Rooms - Complementary Services		
20-6210	Complimentary services - rooms	This account shall be charged with the retail value of all complimentary hotel rooms authorized by the management of the rooms department.
20-6220	Complimentary services - food	This account shall be charged with the retail value of complimentary meals authorized by the management of the rooms department other than amounts charged to account 20-6221.
20-6221	Complimentary services - coupon redemption food	This account shall be charged with the retail value of complimentary food attributable to coupon redemptions authorized by the management of the rooms department. This account shall apply to coupon redemption programs which entitle patrons to redeem coupons for complimentary food.
20-6230	Complimentary services - beverage	This account shall be charged with the retail value of complimentary beverages authorized by the management of the rooms department other than amounts charged to account 20-6231.

20-6231	Complimentary services - coupon redemption beverage	This account shall be charged with the retail value of complimentary beverages attributable to coupon redemptions authorized by the management of the rooms department. This accounts shall apply to coupon redemption programs which entitle patrons to redeem coupons for complimentary beverages.
20-6240	Complimentary services - travel	This account shall be charged with the cost of any complimentary travel authorized by the management of the rooms department. Included in these amounts shall be the cost of ground transportation, chartered aircraft, chartered seacoast, and airline tickets.
20-6245	Complimentary services - coupon redemption cash and tokens	This account shall be charged with the value of coupons redeemed for cash and tokens authorized by the management of the rooms department. This account shall apply to coupon redemption programs which entitle patrons to redeem coupons for complimentary cash or tokens including, but not limited to, bus coupons.
20-6250	Complimentary services - other	This account shall be charged with the retail value of other complimentary goods and services which were credited as complimentary revenue to other complimentary goods and services, other than amounts charged to accounts 20-6210 through 20-6245 and 20-6251, authorized by the management of the rooms department.

20-6251	Complimentary services - coupon redemption - other	This account shall be charged with the retail value of coupons redeemed for other complimentary goods and services which were credited as complimentary revenue to other operating departments and with the cost of all other coupons redeemed for other complimentary goods and services, other than amounts charged to accounts 20-6221, 20-6231, and 20-6245, authorized by the management of the rooms department.
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Rooms - Other Expenses		
20-6600	Provision for doubtful accounts	This account shall be charged with the estimated amount of hotel receivables which will ultimately prove to be uncollectible. The contra amount shall be credited to account 1250, allowances for doubtful hotel accounts.
20-7900	Other operating expenses	This account shall be charged with all other expenses directly attributable to the rooms department. Examples of items to be included are guest supplies, laundry charges, and uniforms.

FOOD AND BEVERAGE		
Food and Beverage - Revenue and Allowances		
Number	Account Title	Text of Accounts
40-3300	Food sales	This account shall be credited with all revenue derived by the Nation gaming operation from the sale of food.
40-3390	Complimentary food sales	This account shall be credited with the retail value of all complimentary meals served to patrons and guests.

40-3400	Beverage sales	This account shall be credited with all revenue derived by the Nation gaming operation from the sale of beverages.
40-3490	Complimentary beverage sales	This account shall be credited with the retail value of all complimentary beverages served to patrons and guests.
40-3890	Other income	This account shall be credited with all miscellaneous income of the food and beverage department. Included shall be public rooms rentals and sundry banquet income, but not cover charges.
40-3910	Allowances on food sales	This account shall be charged with all allowances granted against previously recorded food sales.
40-3920	Allowances on beverage sales	This account shall be charged with all allowances granted against previously recorded beverage sales.
Food and Beverage - Cost of Sales		
40-4300	Cost of food consumed	This account shall be charged with the cost of all meals served. This account shall be credited with any miscellaneous steward's and commissary sales.
40-4350	Cost of employees' meals	This account shall be credited with the estimated cost of food and beverages provided to employees. The contra entry shall be distributed to the departments of the employees served.
40-4400	Cost of beverage sales	This account shall be charged with the cost of all beverages served.
Food and Beverage - Payroll and Related Expenses		

40-5100	Salaries and wages - other employees	This account shall be charged with all salaries and wages and bonus payments for employees of the food and beverage department who are not officers of the Nation gaming operation. This category of expense includes overtime premium, holiday, vacation, and sick pay. Examples of employees who shall be charged to this account are the food and beverage manager, kitchen personnel, and serving personnel.
40-5200	Salaries and wages - officers	This account shall be charged with all salaries and wages and bonus payments for employees of the food and beverage department who are also officers of the Nation gaming operation.
40-5500	Payroll taxes and benefits	This account shall be charged with all payroll taxes, workers' compensation, group insurance, employee meals, and other payroll benefit expenses attributable to employees of the food and beverage department.
Food and Beverage - Complimentary Services		
40-6210	Complimentary services - rooms	This account shall be charged with the retail value of all complimentary hotel rooms authorized by the management of the food and beverage department.
40-6220	Complimentary services - food	This account shall be charged with the retail value of complimentary meals authorized by the management of the food and beverage department other than amounts charged to account 40-6221.
40-6221	Complimentary services - coupon redemption food	This account shall be charged with the retail value of complimentary food attributable to coupon redemptions authorized by the management of the food and beverage department. This account shall apply to coupon redemption programs which entitle patrons to redeem coupons for complimentary food.

40-6230	Complimentary services - beverage	This account shall be charged with the retail value of complimentary beverages authorized by the management of the food and beverage department other than amounts charged to account 40-6231.
40-6231	Complimentary services - coupon redemption beverage	This account shall be charged with the retail value of complimentary beverages attributable to coupon redemptions authorized by the management of the food and beverage department. This account shall apply to coupon redemption programs which entitle patrons to redeem coupons for complimentary beverages.
40-6240	Complimentary services - travel	This account shall be charged with the cost of any complimentary travel authorized by the management of the food and beverage department. Included in these amounts shall be the cost of ground transportation, chartered aircraft, chartered seacoast, and airline tickets.
40-6245	Complimentary services - coupon redemption cash and tokens	This account shall be charged with the value of coupons redeemed for cash and tokens authorized by the management of the food and beverage department. This account shall apply to coupon redemption programs which entitle patrons to redeem coupons for complimentary cash or tokens including, but not limited to, bus coupons.
40-6250	Complimentary services - other	This account shall be charged with the retail value of other complimentary goods and services which were credited as complimentary revenue to other operating departments and with the cost of all other complimentary goods and services, other than amounts charged to accounts 40-6210 through 40-6245 and 40-6251, authorized by the management of the food and beverage department.

40-6251	Complimentary services - coupon redemption other	This account shall be charged with the retail value of coupons redeemed for other complimentary goods and services which were credited as complimentary revenue to other operating departments and with the cost of all other coupons redeemed for other complimentary goods and services, other than amounts charged to accounts 40-6221, 40-6231, and 40-6245, authorized by the management of the food and beverage department.
Food and Beverage - Other Expenses		
40-6300	Licenses and fees	This account shall be charged with alcoholic beverage license fees, employee licensing fees, and any other license fees.
40-6600	Provision for doubtful accounts	This account shall be charged with the estimated amount of food and beverage receivables which will ultimately prove to be uncollectible. The contra account shall be credited to account 1256, allowance for doubtful food and beverage accounts.

40-7900	Other operating expenses This account shall be charged with all other expenses directly attributable to the food and beverage department. Examples of items to be included are china, glassware, linen, and uniforms.
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OTHER OPERATING DEPARTMENTS	
Other Operating Departments - Miscellaneous profit centers	
Number	Account Title Text of Account
50-1000	Telephone department
50-2000	Garage and parking lot
50-3000	Guest laundry
50-4000	Swimming pool
50-5000	Tennis courts
50-6000	Game room
50-7000	Gift shop
50-8000	Package liquor store

Other Operating Departments - Revenue and Allowances	
Number	Account Title Text of Accounts
60-3500	Revenue from services This account shall be credited with all revenue derived by the Nation gaming operation for services such as tennis court fees, bike rentals, guest laundry charges, and telephone charges.
60-3530	Complimentary services - travel This account shall be credited with the retail value of all complimentary travel services provided by the other operating departments.

60-3540	Complimentary services - other	This account shall be credited with the retail value of all complimentary services, other than travel, provided by other operating departments.
60-3550	Sales of merchandise	This account shall be credited with the revenue from sales of items such as gift shop merchandise and tennis shop merchandise.
60-3590	Complimentary sales of merchandise	This account shall be credited with the retail value of all complimentary sales of merchandise by other operating departments.
60-3900	Allowances	This account shall be charged with all allowances granted against sales and services previously recorded by other operating departments.
Other Operating Departments - Cost of Sales		
60-4550	Cost of merchandise sold	This account shall be charged with the related costs of sales for all revenue recorded in accounts 60-3550 and 60-3590.
Other Operating Departments - Payroll and Related Expenses		
60-5100	Salaries and wages - other employees	This account shall be charged with all salaries and wages and bonus payments for employees of other operating departments who are not officers of the Nation gaming operation. This category of expense includes overtime premium, holiday, vacation, and sick pay.
60-5200	Salaries and wages - officers	This account shall be charged with all salaries and wages and bonus payments for employees of other operating departments who are also officers of the Nation gaming operation.
60-5500	Payroll taxes and benefits	This account shall be charged with all payroll taxes, workers' compensation, group insurance, employee meals, and other payroll benefit expenses attributable to employees of other operating departments.

Other Operating Departments - Complimentary Services

60-6210	Complimentary services - rooms	This account shall be charged with the retail value of all complimentary hotel rooms authorized by the management of other operating departments.
60-6220	Complimentary services - food	This account shall be charged with the retail value of complimentary meals authorized by the management of other operating departments other than amounts charged to account 60-6221.
60-6221	Complimentary services - coupon redemption food	This account shall be charged with the retail value of complimentary food attributable to coupon redemptions authorized by the management of other operating departments. This account shall apply to coupon redemption programs which entitle patrons to redeem coupons for complimentary food.
60-6230	Complimentary services - beverage	This account shall be charged with the retail value of complimentary beverages authorized by the management of other operating departments other than amounts charged to account 60-6231.
60-6231	Complimentary services - coupon redemption beverage	This account shall be charged with the retail value of complimentary beverages attributable to coupon redemptions authorized by the management of other operating departments. This account shall apply to coupon redemption programs which entitle patrons to redeem coupons for complimentary beverages.
60-6240	Complimentary services - travel	This account shall be charged with the cost of any complimentary travel authorized by the management of other operating departments. Included in these amounts shall be the cost of ground transportation, chartered aircraft, chartered seacoast, and airline tickets.

60-6245	Complimentary services - coupon redemption cash and tokens	This account shall be charged with the value of coupons redeemed for cash and tokens authorized by the management of other operating departments. This account shall apply to coupon redemption programs which entitle patrons to redeem coupons for complimentary cash or tokens including, but not limited to, bus coupons.
60-6250	Complimentary services - other	This account shall be charged with the retail value of other complimentary goods and services which were credited as complimentary revenue to other operating departments and with the cost of all other complimentary goods and services, other than amounts charged to accounts 60-6210 through 60-6245 and 60-6251, authorized by the management of other operating departments.
60-6251	Complimentary services - coupon redemption other	This account shall be charged with the retail value of coupons redeemed for other complimentary goods and services which were credited as complimentary revenue to other operating departments and with the cost of all other coupons redeemed for other complimentary goods and services, other than amounts charged to accounts 60-6221, 60-6231, and 60-6245, authorized by the management of other operating departments.
Other Operating Departments - Other Expenses		
60-7900	Other operating expenses	This account shall be charged with all other expenses directly attributable to other operating departments. Examples of items to be included are contract services, operating supplies, uniforms, and telephone equipment rental.

RENTAL, CONCESSION AND COMMISSION INCOME

Rental, Concession and Commission Income		
Number	Account Title	Text of Accounts
79-3810	Space rentals	This account shall be credited with all income derived from the rental of space to others for use as stores, offices, and displays.
79-3820	Concessions	This account shall be credited with all revenue derived from others for the privilege of operating departments normally operated by the Nation gaming operation.
79-3830	Commissions	This account shall be credited with the commissions derived from pay telephones, taxicab services, sightseeing and tour operators, automobile rental agencies, etc.
79-3840	Vending machine income	This account shall be credited with all revenues derived from vending machines. Any cost of merchandise related to this revenue shall be charged against this same account.
79-3850	Cash discounts earned	This account shall be credited with all discounts earned from the payment of creditors' invoices within a specified discount period.
79-3890	Other operating income	This account shall be credited with all operating income not specifically provided for in other accounts. Nonoperating income such as interest income shall be credited to various accounts in the other revenue and expenses section. Any expenses or costs directly attributable to earning or deriving other operating income shall be charged against this account.

EXECUTIVE OFFICE

Executive Department - Payroll and Related Expenses

Number	Account Title	Text of Accounts
81-5100	Salaries and wages - other employees	This account shall be charged with all salaries and wages and bonus payments for employees of the executive office who are not officers of the Nation gaming operation. This category of expense includes overtime premium, holiday, vacation, and sick pay. Examples of employees who may be charged to this account are the executive office secretaries and clerks.
81-5200	Salaries and wages - officers	This account shall be charged with all salaries and wages and bonus payments for employees of the executive office who are also officers of the Nation gaming operation.
81-5500	Payroll taxes and benefits	This account shall be charged with all payroll taxes, workers' compensation, group insurance, employee meals, and other payroll benefit expenses attributable to employees of the executive office.
Executive Department - Complimentary Services		
81-6210	Complimentary services - rooms	This account shall be charged with the retail value of all complimentary hotel rooms authorized by the management of the executive office.
81-6220	Complimentary services - food	This account shall be charged with the retail value of complimentary meals authorized by the management of the executive office other than amounts charged to account 81-6221.

81-6221	Complimentary services - coupon redemption food	This account shall be charged with the retail value of complimentary food attributable to coupon redemptions authorized by the management of the executive office. This account shall apply to coupon redemption programs which entitle patrons to redeem coupons for complimentary food.
81-6230	Complimentary services - beverage	This account shall be charged with the retail value of complimentary beverages authorized by the management of the executive office other than amounts charged to account 81-6231.
81-6231	Complimentary services - coupon redemption beverage	This account shall be charged with the retail value of complimentary beverages attributable to coupon redemptions authorized by the management of the executive office. This account shall apply to coupon redemption programs which entitle patrons to redeem coupons for complimentary beverages.
81-6240	Complimentary services - travel	This account shall be charged with the cost of any complimentary travel authorized by the management of the executive office. Included in these amounts shall be the cost of ground transportation, chartered aircraft, chartered seacoast, and airline tickets.
81-6245	Complimentary services - coupon redemption cash and tokens	This account shall be charged with the value of coupons redeemed for cash and tokens authorized by the management of the executive office. This account shall apply to coupon redemption programs which entitle patrons to redeem coupons for complimentary cash or tokens including, but not limited to, bus coupons.

81-6250	Complimentary services - other	This account shall be charged with the retail value of other complimentary goods and services which were credited as complimentary revenue to other operating departments and with the cost of all other complimentary goods and services, other than amounts charged to accounts 81-6210 through 81-6245 and 81-6251, authorized by the management of the executive office.
81-6251	Complimentary services - coupon redemption other	This account shall be charged with the retail value of coupons redeemed for other complimentary goods and services which were credited as complimentary revenue to other operating departments and with the cost of all other coupons redeemed for other complimentary goods and services, other than amounts charged to accounts 81-6221, 81-6231, and 81-6245, authorized by the management of the executive office.
Executive Departments - Other Expenses		
81-6401	Management fees - other	This account shall be charged with all management fees paid to other than affiliates for the operation of the Nation gaming operation. Amounts paid specifically as management fees for the operation of the Gaming Department shall be charged to account number 10-6401.
81-6920	Directors' fees	This account shall be charged with all amounts paid to members of the board of directors for their services as directors.
81-6940	Other contributions	This account shall be charged with all contributions made by the Nation gaming operation other than those eligible to be charged to accounts 99-9556 or 99-9557.

81-7900	Other operating expenses	This account shall be charged with all other expenses directly attributable to the executive office.
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ACCOUNTING AND AUDITING		
Accounting and Auditing Department - Payroll and Related Expenses		
Number	Account Title	Text of Accounts
82-5100	Salaries and wages - other employees	This account shall be charged with all salaries and wages and bonus payments for employees of the accounting and auditing department who are not officers of the Nation gaming operation. This category of expense includes overtime premium, holiday, vacation, and sick pay. Included in this group of employees shall be the controller, paymaster, accounting clerks, and internal auditors.
82-5200	Salaries and wages - officers	This account shall be charged with all salaries and wages and bonus payments for employees of the accounting and auditing department who are also officers of the Nation gaming operation.
82-5500	Payroll taxes and benefits	This account shall be charged with all payroll taxes, workers' compensation, group insurance, employee meals, and other payroll benefit expenses attributable to employees of the accounting and auditing department.
Accounting and Auditing Department - Complimentary Services		
82-6210	Complimentary services - rooms	This account shall be charged with the retail value of all complimentary hotel rooms authorized by the management of the accounting and auditing department.

82-6220	Complimentary services - food	This account shall be charged with the retail value of complimentary meals authorized by the management of the accounting and auditing department other than amounts charged to account 82-6221.
82-6221	Complimentary services - coupon redemption food	This account shall be charged with the retail value of complimentary food attributable to coupon redemptions authorized by the management of the accounting and auditing department. This account shall apply to coupon redemption programs which entitle patrons to redeem coupons for complimentary food.
82-6230	Complimentary services - beverage	This account shall be charged with the retail value of complimentary beverages authorized by the management of the accounting and auditing department other than amounts charged to account 82-6231.
82-6231	Complimentary services - coupon redemption beverage	This account shall be charged with the retail value of complimentary beverages attributable to coupon redemptions authorized by the management of the accounting and auditing department. This account shall apply to coupon redemption programs which entitle patrons to redeem coupons for complimentary beverages.
82-6240	Complimentary services - travel	This account shall be charged with the cost of any complimentary travel authorized by the management of the accounting and auditing department. Included in these amounts shall be the cost of ground transportation, chartered aircraft, chartered seacoast, and airline tickets.

82-6245	Complimentary services - coupon redemption cash and tokens	This account shall be charged with the value of coupons redeemed for cash and tokens authorized by the management of the accounting and auditing department. This account shall apply to coupon redemption programs which entitle patrons to redeem coupons for complimentary cash or tokens including, but not limited to, bus coupons.
82-6250	Complimentary services - other	This account shall be charged with the retail value of other complimentary goods and services which were credited as complimentary revenue to other operating departments and with the cost of all other complimentary goods and services, other than amounts charged to accounts 82-6210 through 82-6245 and 82-6251, authorized by the management of the accounting and auditing department.
82-6251	Complimentary services - coupon redemption other	This account shall be charged with the retail value of coupons redeemed for other complimentary goods and services which were credited as complimentary revenue to other operating departments and with the cost of all other coupons redeemed for other complimentary goods and services, other than amounts charged to accounts 82-6221, 82-6231, and 82-6245, authorized by the management of the accounting and auditing department.
Accounting and Auditing Department - Other Expenses		
82-7900	Other operating expense	This account shall be charged with all other expenses directly attributable to the accounting and auditing department. Examples of items to be included are printing, stationery expense, postage, and auditing fees.

SECURITY DEPARTMENT

Security Department -
Payroll and Related Expenses

Number	Account Title	Text of Accounts
84-5100	Salaries and wages - other employees	This account shall be charged with all salaries and wages and bonus payments for employees of the security department who are not officers of the Nation gaming operation. This category of expense includes overtime premium, holiday, vacation, and sick pay. Included in this group of employees shall be security guards and surveillance personnel in both the Gaming Department and hotel areas.
84-5200	Salaries and wages - officers	This account shall be charged with all salaries and wages and bonus payments for employees of the security department who are also officers of the Nation gaming operation.
84-5500	Payroll taxes and benefits	This account shall be charged with all payroll taxes, workers' compensation, group insurance, employee meals, and other payroll benefit expenses attributable to employees of the security department.

Security Department - Complimentary Services

84-6210	Complimentary services - rooms	This account shall be charged with the retail value of all complimentary hotel rooms authorized by the management of the security department.
84-6220	Complimentary services - food	This account shall be charged with the retail value of complimentary meals authorized by the management of the security department other than amounts charged to account 84-6221.

84-6221	Complimentary services - coupon redemption food	This account shall be charged with the retail value of complimentary food attributable to coupon redemptions authorized by the management of the security department. This account shall apply to coupon redemption programs which entitle patrons to redeem coupons for complimentary food.
84-6230	Complimentary services - beverage	This account shall be charged with the retail value of complimentary beverages authorized by the management of the security department other than amounts charged to account 84-6231.
84-6231	Complimentary services - coupon redemption beverage	This account shall be charged with the retail value of complimentary beverages attributable to coupon redemptions authorized by the management of the security department. This account shall apply to coupon redemption programs which entitle patrons to redeem coupons for complimentary beverages.
84-6240	Complimentary services - travel	This account shall be charged with the cost of any complimentary travel authorized by the management of the security department. Included in these amounts shall be the cost of ground transportation, chartered aircraft, chartered seacoast, and airline tickets.
84-6245	Complimentary services - coupon redemption cash and tokens	This account shall be charged with the value of coupons redeemed for cash and tokens authorized by the management of the security department. This account shall apply to coupon redemption programs which entitle patrons to redeem coupons for complimentary cash or tokens including, but not limited to, bus coupons.

84-6250	Complimentary services - other	This account shall be charged with the retail value of other complimentary goods and services which were credited as complimentary revenue to other operating departments and with the cost of all other complimentary goods and services, other than amounts charged to accounts 84-6210 through 84-6245 and 84-6251, authorized by the management of the security department.
84-6251	Complimentary services - coupon redemption other	This account shall be charged with the retail value of coupons redeemed for other complimentary goods and services which were credited as complimentary revenue to other operating departments and with the cost of all other coupons redeemed for other complimentary goods and services, other than amounts charged to accounts 84-6221, 84-6231, and 84-6245, authorized by the management of the security department.
Security Department - Other Expenses		
84-7900	Other operating expenses	This account shall be charged with all other expenses directly attributable to the security department. Examples of items to be included are security equipment, maintenance, alarm services, and uniforms.

OTHER ADMINISTRATIVE AND GENERAL DEPARTMENTS	
Other Administrative and General Departments - Payroll and Related Services	
Number	Text of Accounts

89-5100	Salaries and wages - other employees	<p>This account shall be charged with all salaries and wages and bonus payments for employees of other administrative and general departments who are not officers of the Nation gaming operation.</p> <p>This category of expense includes overtime premium, holiday, vacation, and sick pay. Examples of employees to be included in this account are data processing, purchasing, and personnel employees.</p>
89-5200	Salaries and wages - officers	<p>This account shall be charged with all salaries and wages and bonus payments for employees of other administrative and general departments who are also officers of the Nation gaming operation.</p>
89-5500	Payroll taxes and benefits	<p>This account shall be charged with all payroll taxes, workers' compensation, group insurance, employee meals, and other payroll benefit expenses attributable to employees of other administrative and general departments.</p>
Other Administrative and General Departments - Complimentary Services		
89-6210	Complimentary services - rooms	<p>This account shall be charged with the retail value of all complimentary hotel rooms authorized by the management of other administrative and general departments.</p>
89-6220	Complimentary services - food	<p>This account shall be charged with the retail value of complimentary meals authorized by the management of other administrative and general departments other than amounts charged to account 89-6221.</p>

89-6221	Complimentary services - coupon redemption food	This account shall be charged with the retail value of complimentary food attributable to coupon redemptions authorized by the management of other administrative and general departments. This account shall apply to coupon redemption programs which entitle patrons to redeem coupons for complimentary food.
89-6230	Complimentary services - beverage	This account shall be charged with the retail value of complimentary beverages authorized by the management of other administrative and general departments other than amounts charged to account 89-6231.
89-6231	Complimentary services - coupon redemption beverage	This account shall be charged with the retail value of complimentary beverages attributable to coupon redemptions authorized by the management of other administrative and general departments. This account shall apply to coupon redemption programs which entitle patrons to redeem coupons for complimentary beverages.
89-6240	Complimentary services - travel	This account shall be charged with the cost of any complimentary travel authorized by the management of other administrative and general departments. Included in these amounts shall be the cost of ground transportation, chartered aircraft, chartered seacoast, and airline tickets.
89-6245	Complimentary services - coupon redemption cash and tokens	This account shall be charged with the value of coupons redeemed for cash and tokens authorized by the management of other administrative and general departments. This account shall apply to coupon redemption programs which entitle patrons to redeem coupons for complimentary cash or tokens including, but not limited to, bus coupons.

89-6250	Complimentary services - other	This account shall be charged with the retail value of other complimentary goods and services which were credited as complimentary revenue to other operating departments and with the cost of all other complimentary goods and services, other than amounts charged to accounts 89-6210 through 89-6245 and 89-6251, authorized by the management of other administrative and general departments.
89-6251	Complimentary services - coupon redemption other	This account shall be charged with the retail value of coupons redeemed for other complimentary goods and services which were credited as complimentary revenue to other operating departments and with the cost of all other coupons redeemed for other complimentary goods and services, other than amounts charged to accounts 89-6221, 89-6231, and 89-6245, authorized by the management of other administrative and general departments.
Other Administrative and General Departments - Other Expenses		
89-6600	Provision for doubtful accounts	This account shall be charged with the estimated amount of miscellaneous receivables which will ultimately prove to be uncollectible. The contra amount shall be credited to account 1290, the allowance for doubtful accounts - other receivables.
89-7750	General insurance - officers' life	This account shall be charged with the monthly amortization of amounts paid for officers' life insurance.

89-7751	General insurance - other	This account shall be charged with monthly amortization of amounts paid for liability, theft loss, and other types of general insurance. Insurance expense related to the building and its contents shall be charged to account 94-7700.
89-7900	Other operating expenses	This account shall be charged with all other expenses directly attributable to other administrative and general departments.

MARKETING

Marketing - Payroll and Related Expenses

Number	Account Title	Text of Accounts
90-5100	Salaries and wages - other employees	This account shall be charged with all salaries and wages and bonus payments for employees of the marketing department who are not officers of the Nation gaming operation. This category of expense includes overtime premium, holiday, vacation, and sick pay.
90-5200	Salaries and wages - officers	This account shall be charged with all salaries and wages and bonus payments for employees of the marketing department who are also officers of the Nation gaming operation.
90-5500	Payroll taxes and benefits	This account shall be charged with all payroll taxes, workers' compensation, group insurance, employee meals, and other payroll benefit expenses attributable to employees of the marketing department.

Marketing - Complimentary Services

90-6210	Complimentary services - rooms	This account shall be charged with the retail value of all complimentary hotel rooms authorized by the management of the marketing department.
90-6220	Complimentary services - food	This account shall be charged with the retail value of complimentary meals authorized by the management of the marketing department other than amounts charged to account 90-6221.
90-6221	Complimentary services - coupon redemption food	This account shall be charged with the retail value of complimentary food attributable to coupon redemptions authorized by the management of the marketing department. This account shall apply to coupon redemption programs which entitle patrons to redeem coupons for complimentary food.
90-6230	Complimentary services - beverage	This account shall be charged with the retail value of complimentary beverages authorized by the management of the marketing department other than amounts charged to account 90-6231.
90-6231	Complimentary services - coupon redemption beverage	This account shall be charged with the retail value of complimentary beverages attributable to coupon redemptions authorized by the management of the marketing department. This account shall apply to coupon redemption programs which entitle patrons to redeem coupons for complimentary beverages.

90-6240	Complimentary services - travel	This account shall be charged with the cost of any complimentary travel authorized by the management of the marketing department. Included in these amounts shall be the cost of ground transportation, chartered aircraft, chartered seacoast, and airline tickets.
90-6245	Complimentary services - coupon redemption cash and tokens	This account shall be charged with the value of coupons redeemed for cash and tokens authorized by the management of the marketing department. This account shall apply to coupon redemption programs which entitle patrons to redeem coupons for complimentary cash or tokens including, but not limited to, bus coupons.
90-6250	Complimentary services - other	This account shall be charged with the retail value of other complimentary goods and services which were credited as complimentary revenue to other operating departments and with the cost of all other complimentary goods and services, other than amounts charged to accounts 90-6210 through 90-6245 and 90-6251, authorized by the management of the marketing department.
90-6251	Complimentary services - coupon redemption other	This account shall be charged with the retail value of coupons redeemed for other complimentary goods and services which were credited as complimentary revenue to other operating departments and with the cost of all other coupons redeemed for other complimentary goods and services, other than amounts charged to accounts 90-6221, 90-6231, and 90-6245, authorized by the management of the marketing department.

Marketing - Other Expenses

90-7210	Sales expenses	This account shall be charged with all amounts directly attributable to sales employees, other than payroll and complimentary expenses. Examples of items to be included are expenses related to travel and trade show promotions.
Marketing - Advertising Expenses		
90-7220	Newspaper and magazine	This account shall be charged with all amounts paid for newspaper and magazine advertising, other than payroll and complimentary expenses.
90-7221	Television and radio	This account shall be charged with all amounts paid for television and radio advertising, other than payroll and complimentary expenses.
90-7222	Advertising expenses - outdoor and billboard	This account shall be charged with all amounts paid for outdoor and billboard advertising, other than payroll and complimentary expenses.
90-7223	direct mail	This account shall be charged with all amounts paid for mail advertising, other than payroll and complimentary expenses.
90-7224	Production and art work	This account shall be charged with all amounts paid for advertising production and artwork, other than payroll and complimentary expenses.
90-7225	Other	This account shall be charged with all other amounts paid for advertising, other than payroll and complimentary expenses.
90-7230	Air charter and flight program expenses	This account shall be charged with all amounts paid for air charters, flight programs, and subsidies, other than payroll and complimentary expenses.

90-7235	Bus subsidy expenses	This account shall be charged with amounts paid to subsidize bus trips to the Gaming Department, other than payroll and complimentary expenses.
90-7240	Public relations and publicity	This account shall be charged with all expenses incurred for the general promotion of the industry in the Atlantic City area. Examples of items to be included are expenses for involvement in convention bureaus and civic and community activities.
90-7260	Fees and commissions - marketing	This account shall be charged with all amounts paid to travel agents, advertising agencies, franchise companies, and hotel representatives.
90-7900	Other operating expenses	This account shall be charged with all other expenses incurred to obtain patrons and guests by promoting the Nation gaming operation.

GUEST ENTERTAINMENT

Guest Entertainment - Revenue from Cover Charges

Number	Account Title	Text of Accounts
91-3710	Cover charges	This account shall be credited with all admission charges received from patrons and guests for entertainment.

Guest Entertainment - Payroll and Related Expenses

91-5100	Salaries and wages - other employees	This account shall be charged with all salaries and wages and bonus payments for employees of the guest entertainment department who are not officers of the Nation gaming operation. This category of expense includes overtime premium, holiday, vacation, and sick pay. Included in this group of employees shall be the entertainment director, stage hands, stage manager, and any entertainers who are employees of the Nation gaming operation.
91-5200	Salaries and wages - officers	This account shall be charged with all salaries and wages and bonus payments for employees of the guest entertainment department who are also officers of the Nation gaming operation.
91-5500	Payroll taxes and benefits	This account shall be charged with all payroll taxes, workers' compensation, group insurance, employee meals, and other payroll benefit expenses attributable to employees of the guest entertainment department.
Guest Entertainment - Complimentary Services		
91-6210	Complimentary services - rooms	This account shall be charged with the retail value of all complimentary hotel rooms authorized by the management of the guest entertainment department.
91-6220	Complimentary services - food	This account shall be charged with the retail value of complimentary meals authorized by the management of the guest entertainment department other than amounts charged to account 91-6221.

91-6221	Complimentary services - coupon redemption food	This account shall be charged with the retail value of complimentary food attributable to coupon redemptions authorized by the management of the guest entertainment department. This account shall apply to coupon redemption programs which entitle patrons to redeem coupons for complimentary food.
91-6230	Complimentary services - beverage	This account shall be charged with the retail value of complimentary beverages authorized by the management of the guest entertainment department other than amounts charged to account 91-6231.
91-6231	Complimentary services - coupon redemption beverage	This account shall be charged with the retail value of complimentary beverages attributable to coupon redemptions authorized by the management of the guest entertainment department. This account shall apply to coupon redemption programs which entitle patrons to redeem coupons for complimentary beverages.
91-6240	Complimentary services - travel	This account shall be charged with the cost of any complimentary travel authorized by the management of the guest entertainment department. Included in these amounts shall be the cost of ground transportation, charter aircraft, chartered seacoast, and airline tickets.
91-6245	Complimentary services - coupon redemption cash and tokens	This account shall be charged with the value of coupons redeemed for cash and tokens authorized by the management of the guest entertainment department. This account shall apply to coupon redemption programs which entitle patrons to redeem coupons for complimentary cash or tokens including, but not limited to, bus coupons.

91-6250	Complimentary services - other	This account shall be charged with the retail value of other complimentary goods and services which were credited as complimentary revenue to other operating departments and with the cost of all other complimentary goods and services, other than amounts charged to accounts 91-6210 through 91-6245 and 91-6251, authorized by the management of the guest entertainment department.
91-6251	Complimentary services - coupon redemption other	This account shall be charged with the retail value of coupons redeemed for other complimentary goods and services which were credited as complimentary revenue to other operating departments and with the cost of all other coupons redeemed for other complimentary goods and services, other than amounts charged to accounts 91-6221, 91-6231, and 91-6245, authorized by the management of the guest entertainment department.

Guest Entertainment - Other Expenses

91-7300	Contract entertainment	This account shall be charged with the cost of all contract entertainers and musicians. Charges to this account shall include direct payments to entertainers and musicians and the cost of transportation, gifts, and other fringe benefits.
91-7900	Other operating expenses	This account shall be charged with any other expenses directly attributable to the guest entertainment department. Examples of items to be included are costumes, stage decorations, and equipment rental.

PROPERTY OPERATION AND MAINTENANCE

Property Operation and Maintenance - Other Expenses

Number	Account Title	Text of Accounts
92-5100	Salaries and wages - other employees	This account shall be charged with all salaries and wages and bonus payments for employees of the property operation and maintenance department who are not officers of the Nation gaming operation. This category of expense includes overtime premium, holiday, vacation, and sick pay. Included in this group of employees shall be the chief engineer, mechanics, machinists, plumbers, electricians, painters, carpenters, upholsterers, and gardeners.
92-5200	Salaries and wages - officers	This account shall be charged with all salaries and wages and bonus payments for employees of the property operation and maintenance department who are also officers of the Nation gaming operation.
92-5500	Payroll taxes and benefits	This account shall be charged with all payroll taxes, workers' compensation, group insurance, employee meals, and other payroll benefit expenses attributable to employees of the property operation and maintenance department.
Property Operation and Maintenance - Complimentary Services		
92-6210	Complimentary services - rooms	This account shall be charged with the retail value of all complimentary hotel rooms authorized by the management of the property operation and maintenance department.

92-6220	Complimentary services - food	This account shall be charged with the retail value of complimentary meals authorized by the management of the property operation and maintenance department other than amounts charged to account 92-6221.
92-6221	Complimentary services - coupon redemption food	This account shall be charged with the retail value of complimentary food attributable to coupon redemptions authorized by the management of the property operation and maintenance department. This account shall apply to coupon redemption programs which entitle patrons to redeem coupons for complimentary food.
92-6230	Complimentary services - beverage	This account shall be charged with the retail value of complimentary beverages authorized by the management of the property operation and maintenance department other than amounts charged to account 92-6231.
92-6231	Complimentary services - coupon redemption beverage	This account shall be charged with the retail value of complimentary beverages attributable to coupon redemptions authorized by the management of the property operation and maintenance department. This account shall apply to coupon redemption programs which entitle patrons to redeem coupons for complimentary beverages.
92-6240	Complimentary services - travel	This account shall be charged with the cost of any complimentary travel authorized by the management of the property operation and maintenance department. Included in these amounts shall be the cost of ground transportation, chartered aircraft, chartered seacoast, and airline tickets.

92-6245	Complimentary services - coupon redemption cash and tokens	This account shall be charged with the value of coupons redeemed for cash and tokens authorized by the management of the property operation and maintenance department. This account shall apply to coupon redemption programs which entitle patrons to redeem coupons for complimentary cash or tokens including, but not limited to, bus coupons.
92-6250	Complimentary services - other	This account shall be charged with the retail value of other complimentary goods and services which were credited as complimentary revenue to other operating departments and with the cost of all other complimentary goods and services, other than amounts charged to accounts 92-6210 through 92-6245 and 92-6251, authorized by the management of the property operation and maintenance department.
92-6251	Complimentary services - coupon redemption other	This account shall be charged with the retail value of coupons redeemed for other complimentary goods and services which were credited as complimentary revenue to other operating departments and with the cost of all other coupons redeemed for other complimentary goods and services, other than amounts charged to accounts 92-6221, 92-6231, and 92-6245, authorized by the management of the property operation and maintenance department.
Property Operation and Maintenance - Other Expenses		
92-7900	Other operating expenses	This account shall be charged with all other expenses directly attributable to the property operation and maintenance department. Included in this account shall be items such as repair and maintenance materials, contract maintenance services, and engineering supplies.

94-7500	Rent	This account shall be charged with all amounts paid as rent or lease payments for the use of real property or personal property with the following exceptions: Telephone equipment (charged to capital leases; Telephone equipment (charged to account 60-7900); Equipment rented for specific functions such as banquets (charged to the department authorizing the expense).
94-7610	Property tax expense	This account shall be charged with the monthly amortization of real and personal property taxes.
94-7700	Insurance on building and contents	This account shall be charged with the monthly amortization of the cost of insuring the Nation gaming operation's building and contents against damage, destruction by fire, weather, etc. Amounts paid for general insurance such as liability insurance shall be amortized through account 89-7751.

INTEREST EXPENSE

Number	Account Title	Text of Accounts
95-6850	Interest expense - other	This account shall be charged with all interest expense payable to unaffiliated creditors on obligations such as notes payable, mortgages, long-term debt, and deferred financing charges on capital leases.

DEPRECIATION AND AMORTIZATION

Number	Account Title	Text of Accounts
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95-7800	Depreciation and amortization	Depreciation and amortization of property and equipment and other assets. This account shall be charged with the expense for depreciation and amortization of the cost of property and equipment and other assets. The contra entries shall be credited to accounts in the 1800 and 1900 series, as applicable.
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OTHER REVENUE AND EXPENSES		
Other Revenue and Expense - Nonoperating Income and Expense		
Number	Account Title	Text of Accounts
99-9100	Interest income	This account shall be credited with all interest income earned from investments, notes and other receivables, and time deposits other than amounts credited to accounts 99-9104 and 99-9105.
99-9110	Dividend income	This account shall be credited with all dividends from investments in securities.
99-9120	Gains (losses) on disposal of property	This account shall be credited with all gains and charged with all losses on the disposal of property and equipment.

99-9130	Realized gains (losses) on debt and equity securities	This account shall be charged with all losses and credited with all gains resulting from the sale of debt and equity securities other than amounts included in accounts 99-9142 and 99-9143. The gain or loss shall be computed as the difference between the net selling price and the carrying value.
99-9150	Unrealized holding gains (losses) on debt and equity securities	This account shall be charged (loss) or credited (gain) with the change during the current accounting period in any excess of the carrying value over the current market value for marketable equity securities, other than amounts reported in accounts 99-9550 and 99-9551, which are required to be reported in current earnings under generally accepted accounting principles. The contra entry should be charged or credited to account 1120.
99-9400	Miscellaneous income	This account shall be credited with all income and miscellaneous credits not specifically provided for in other account classifications.
99-9500	Miscellaneous expenses	This account shall be charged with all expenses and miscellaneous debits not specifically provided for in other account classifications.
Other Revenue and Expenses -		
Extraordinary Items and Accounting Changes		
99-9600	Extraordinary credits	This account shall be credited with all income and credits which meet the definition of extraordinary credits.

99-9700	Extraordinary charges	This account shall be charged with all expenses and debits which meet the definition of extraordinary charges.
99-9800	Cumulative effect of accounting changes	This account shall be charged or credited with the cumulative effect, as of the beginning of the period, of permissible changes in accounting principles which do not qualify as prior period adjustments but which affect the determination of the current period's net income or loss.

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Appendix G
State Assessment for Costs of Class III Gaming Oversight

(a) Definitions.

- (1) Executive Budget. This term refers to the New York State Governor's constitutionally mandated annual submission to the State Legislature containing his or her plan of recommended appropriations, expenditures and cash disbursements necessary to carry out programs, along with estimates of revenues and cash receipts expected to be available to support these expenditures and disbursements for the forthcoming fiscal year.
- (2) Personal service costs. Personal service costs represent salaries and non-wage compensation for State employees and certain payments to non-State employees. Personal service costs also include fringe benefits and indirect costs associated with the expense of staffing and overhead costs.
- (3) Non-personal service costs. Non-personal service costs represent such items as contractual services, equipment and supplies and include items directly related to, and dedicated exclusively for, Class III gaming regulation.
- (4) STIP account. This account is a reserve fund maintained and utilized by the Office of the State Comptroller to provide short-term loans to State and local government entities for funding shortfalls.
- (5) Sole-Custody Account. A sole-custody account is administered by an individual State agency official and

is not under the joint custody of the Office of the State Comptroller and the Commissioner of Taxation and Finance.

- (6) Office of the State Comptroller, also known as the Department of Audit and Control. This agency, headed by the statewide elected position of Comptroller, maintains the State's accounts; pays the State's payrolls and bills; invests State funds; audits State agencies and local governments; and administers the State employee retirement system.
 - (7) Division of the Budget. The Division of the Budget is an agency within the Executive Department of New York State government. The Division of the Budget assists the Governor with respect to the formulation of the budget and the correlating and revising of estimates and requests for appropriations of the civil departments and investigates, supervises and coordinates the expenditures and other fiscal operations of such departments.
- (b) Generally. The State shall assess and the Nation shall pay for costs incurred by the State in ensuring Nation compliance with the terms of this Compact as provided in 25 U.S.C. § 2710
- (d) (3) (C) (iii). These costs shall include the actual costs of wages of State employees, their training and educational materials, their fringe benefits, and their relevant travel, lodging and other expenses when those employees are performing State responsibility under this Compact. Those costs shall also include such other non-employee expenses as equipment, space, vehicles, utility and maintenance costs reasonably necessary for those employees to perform their roles as specified in the Compact.

(c) Budget Planning. Annually, on or about October 1, the State, after consultation with the Nation, shall provide the Nation with a budget estimate of State costs expected to be incurred during the following State fiscal year, i.e., from April 1 to March 31 of the succeeding year. The purpose of the budget planning is to enable the Nation and the State to engage in forward fiscal planning. Coordination of estimates shall be the responsibility of an agency or agencies of the State designated by written notice to the Nation. The comprehensive budget estimate shall be submitted to the Division of the Budget for review and inclusion in the Executive Budget. The budget estimate shall include a level of detail no less than contained in the schedule below in subdivision (d).

(d) Budget estimate schedule. The Budget estimate shall include a specific breakdown as follows:

(1) Personal service costs. A listing of personal service costs shall be outlined as follows:

a. Staffing. Staffing shall include a listing, by categories, of all State employees by job title, pay grade, anticipated pay, and number of positions within each category.

b. Fringe Benefits and Indirect Costs. Fringe benefits and indirect costs shall be computed through the use of the annual percentage rate promulgated by the Division of Budget for the cost of benefits provided to State employees. This percentage shall be applied against an employee's salary and added thereto.

- c. Allocation of Costs. A percentage of the total salaries of State employees directly assigned on a full-time or part-time basis to perform State responsibilities as specified in this Compact. A method of allocation in conformance with Generally Accepted Accounting Principles shall be employed.

- (2) Non-personal service. Non-personal service costs shall include items directly related to, and dedicated State exclusively to, responsibilities as specified in These items this Compact. shall include, but not be limited to, telephones, pagers, vehicles and related equipment. Estimated annual costs for each enumerated item shall be detailed.

- (c) Nation Notice to State. The Nation shall provide the State, prior to October 1 of each year, its best estimate on the number of gaming facilities that will be operating on Nation lands during the ensuing State fiscal year. During that year, the SGO shall be officially notified not less than ninety (90) days of the intent of the Nation to commence the operation of a new gaming facility or terminate the operation of an existing gaming facility.

- (f) Payments by Nation to State.
 - (1) Assessment by State. The State shall assess the Nation quarterly for actual expenses incurred in executing its responsibilities under this Compact. Time spent by State employees in performance of relevant duties shall be documented by duly executed and approved time cards or an agency certified electronic time keeping system, which

shall be subject to standard State Comptroller audit. Review of these materials by the Nation may be conducted at the appropriate State agency office upon written request. All reimbursement for reasonable expenses for employee travel, lodging and food shall be based upon the policies of the State of New York, promulgated by the Office of the State Comptroller, which are applicable to all State employees, as adjusted from time to time. Purchase of equipment, supplies and other Non-Personal Service items shall be documented by appropriate receipts of purchase or lease. Such documentation shall be submitted to the Nation with the applicable assessment.

- (2) Start-up assessment. During the start-up year of Class III gaming operations, the State's quarterly assessment of costs to the Nation shall be based upon the prospective budget estimates developed by the State in cooperation with the Nation. Within thirty (30) days after the close of the State's fiscal year, the State shall submit an adjusted assessment to the Nation reflecting actual State expenses. If the adjustment demonstrates that the Nation has been overbilled or underbilled, a compensating adjustment will be made in billings to the Nation in the subsequent billing period.
- (3) Subsequent assessments. For each of the second and subsequent years, the first quarterly billing to the Nation, representing the period of actual expenses from April 1 to June 30 inclusive, shall be submitted by the State on or about August 1 of each year. Subsequent quarterly billings shall be submitted to the Nation by the State on or about November 1 for the second quarter,

February 1 for the third quarter, and May 1 for the last quarter.

- (4) Reimbursement by the Nation shall occur within thirty (30) days of billing. All reimbursements shall be deposited in a Sole Custody Account, designated by the appropriate State agency. Reimbursements shall be accompanied by a letter of explanation from the Nation as to the purpose and amount of the reimbursement. Such letter shall be transmitted to the appropriate State agency within twenty-four (24) hours of the reimbursement.
- (g) Resolution of Disputed State Expenses.
- (1) If the Nation disputes the eligibility or validity of any of the State's expenses billed, the Nation shall, within thirty (30) days of the receipt of the assessment officially notify the appropriate State agency of the disputed items billed and specifically enumerate the reason(s) for contesting them. Representatives of the Nation and State shall meet within fifteen (15) days of the dispute to resolve the issues. If, fifteen (15) days after such meeting, the Nation and the State are unable to resolve the dispute(s) to their mutual satisfaction, the dispute resolution procedures provided for in Paragraph 14 of this Compact shall be utilized for a final resolution. Until such resolution is obtained, the Nation shall reimburse all of the undisputed items in a billing to the State; the disputed items may be withheld from payment but shall be deposited in a third-party escrow account until final resolution is obtained.

- (2) If final resolution is not obtained within sixty (60) days of the dispute and a negative balance occurs in the appropriate State agency's budgeted special revenue fund, a STIP loan may then be authorized. If resolution is made on the contested amounts, whether by settlement or through arbitration, the Nation shall be assessed interest in an amount equal to two (2) percentage points above the prime lending rate, compounded daily on the amounts ultimately remitted or required to be remitted by the Nation to the appropriate State agency. The amount ultimately remitted or required to be remitted by the Nation shall be released from escrow within two (2) days of the final resolution. The interest shall be due immediately and shall be remitted in accordance with paragraph (f) (4).

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Appendix H

Seneca Nation of Indians Class III Gaming Facility Tort Claims Ordinance

Resolution No.

Pursuant to the authority vested in the Seneca Nation by virtue of its sovereignty and inherent powers of self-government, the Nation hereby establishes the Seneca Nation of Indians Claims Commission ("Commission").

Article 1 - Definitions

1. "Compensation" means payment for past and future damages made to a claimant by the Nation pursuant to this Ordinance.
2. "Damages" mean only medical expenses, lost earnings, property lost and other economic harms to the claimant that are a direct consequence of an injury caused by the fault of the Nation. "Damages" do not include non-economic injury.
3. "Medical expenses" mean all necessary expenses incurred for:
 - (i) medical, hospital, surgical, nursing, ambulance, x-ray, prescription drug and prosthetic services;
 - (ii) medical supplies and equipment;
 - (iii) psychiatric, physical and occupational therapy and rehabilitation; and
 - (iv) any other professional health services.
- (4) "Lost earnings" mean loss of earnings from work which the person would have performed had he/she not been injured.

- (5) "Injury" includes any alteration or impairment of a temporary or permanent nature to a person or his or her property.
- (6) "Person" means any human being or group of human beings or any entity recognized as a person under the law of any jurisdiction.
"Person" does not mean the Seneca Nation, its enterprises or agents.

Article 2 - Standard for Compensation

The Commission will compensate a person for damages if the person demonstrates to the Commission that he or she, or a person he or she is authorized to represent, was injured due to the fault of the Nation or one of its employees acting within the scope of his or her employment. The Commission will recommend payment for that amount of damage commensurate with the degree to which the fault of the Nation or its employees, who were acting within the scope of their employment, caused the injury. Awards will reasonably compensate for past and future damages caused by the fault of the Nation, but will in no event exceed Five Million and 00/100 Dollars (\$5,000,000.00) to a person.

Article 3 - Establishment of the Claims Commission

1. The Nation establishes the Office of the Seneca Nation of Indians Claims Commission to resolve claims made against the Nation to recover damages arising out of injury alleged in the Nation's Class III Gaming Facilities.
2. This Commission, comprised of at least three Commissioners, and a list of at least two alternate Commissioners authorized to fill temporary vacancies, shall be appointed by the

Nation's Tribal Council. Any three Commissioners may conduct business pursuant to this ordinance. Commissioners and alternate Commissioners shall meet or exceed the minimum eligibility requirements for such appointments as established by Tribal Council and shall have no less than four (4) years experience as a trier of fact in a tribal, State or Federal forum.

3. The Commission shall have those powers and duties common to offices of its kind. In particular, the Commission is authorized to recommend that the Nation compensate a claimant who deserves relief in accordance with the standards and procedures set forth in this Ordinance. To determine whether a claimant should receive compensation, the Commission may investigate or cause the investigation of any claim and may convene an inquiry at which testimony and other evidence may be received. The Commission may in its discretion promulgate regulations to implement this Ordinance, providing that they are consistent with its terms.
4. An individual Commissioner shall recuse himself or herself from reviewing any claim as required to prevent any actual conflict of interest or so as to avoid the appearance of impropriety.
5. In the event that an individual Commissioner is temporarily unable to serve, an alternate Commissioner shall be temporarily appointed and seated, by order of his her appearance on the list alternates, as authorized by the Nation's Tribal Council and until such time as the regular Commissioner is able to resume his or her duties.

6. The Commissioners shall be paid and reimbursed for reasonable, approved expenses by the Nation for his or her services and shall be assisted by such staff, other public bodies or offices of the Nation, and counsel from time to time as deemed necessary by the Nation's Tribal Council to provide for prompt and fair resolution of claims made against the Nation.

Article 4 - Procedures

1. A person, directly or by counsel, may submit a claim for compensation in writing to the Nation Gaming Operation. The Nation Gaming Operation may forward any such claim to the Claims Commission. The claim shall state prominently on its exterior packaging "NOTICE OF CLAIM".
2. The claim must identify the claimant and contain a complete written description of the claim of injury and damage, including a detailed statement of why the Nation Gaming Operation is at fault for the injury claimed. The claim must also be supported by evidence and state the name of the claimant and his or her address and telephone number for home and for business. With respect to each claimant, evidence shall include:
 - (a) a sworn affidavit from the claimant, which shall include his or statement in detail of the relevant facts, a detailed statement concerning past and future lost earnings, and a detailed statement of all other sources of compensation regarding the claimed injuries, including insurance, third parties, and lawsuits;
 - (b) sworn affidavits from witnesses;

- (c) photographs of any injured part of the claimant's body or property;
- (d) a written list of the names, addresses, phone and facsimile numbers of health care providers who, and hospitals which, have treated the claimant for the injury claimed, and all records from medical personnel who are treating or have treated the claimant for the injury claimed, with a written report and prognosis prepared and signed by each physician that has treated or is treating the claimant for the injury claimed;
- (e) a written list of all health care providers, including doctors and hospitals, who have treated claimant during the proceeding ten years; and a written summary that reasonably describes the conditions treated by each of these health care providers, the treatment provided, and the resolution if any, of each condition described;
- (f) all records that show lost income to the claimant due to the injury claimed, including but not limited to income tax returns, if any, filed with any government in the last three (3) years;
- (g) a signed release from the claimant permitting release by third parties, including health care providers, to the Nation of records regarding the claimant or his or her claim; and
- (h) all bills and receipts for which the claimant seeks reimbursement;

- (i) and any other information available to the claimant and necessary for the Commission to evaluate the claim.

Upon a showing of good cause, the Commission may waive a requirement that the claimant submit certain evidence.

- (3) Any submission of a claim for compensation shall be made to the Claims Commission within one year of the date of enactment of this Ordinance or of the date of the injury claimed, whichever is later.
- (4) The Commission may conduct an investigation or an inquiry at which the claimant or the Nation, directly or through counsel, may give testimony and produce witnesses. In the event of such an inquiry, the Commission will provide reasonable advance notice to the claimant of the date, time and location of the inquiry. Failure of the claimant to respond completely to the requirements of the Commission in any regard shall be an independent ground upon which to deny compensation.
- (5) The Commission shall issue a written decision with respect to each claim, stating an evaluation of the claim and recommending an amount of compensation, if any. The decision shall provide the findings of the Commission with respect to the facts underlying the claim. The Commission may consider the existence of collateral sources of compensation which the claimant has and may consider the availability of insurance which the Nation may have to cover any award of compensation. If the Commission concludes that compensation is warranted, then he or she shall recommend to the Nation Representative(s) the amount and terms of that compensation. The Commission shall provide claimant with a copy of the decision.

- (6) The Nation's Tribal Council may review the basis and size of a compensation recommendation to determine whether they are justified by the evidence in support of the claim and whether they are consistent with the best interest of the Nation. The Nation's Tribal Council in its discretion may approve, amend or remand with instructions for further fact finding, any recommendation of the Commission. Upon approval or amendment of the recommendation of the Commission the Commission may notify the claimant.
- (7) Upon receipt by the Commission of a sworn, written release by the claimant of any claim or other liability against the Nation Gaming Operation or any joint tortfeasor, the Commission shall send a copy of such release with a copy of the recommended award to the Nation Gaming Operation, which shall prepare and issue a check on behalf of the Nation to the claimant in the amount of the award.

Article 5 - Interpretation

1. Sovereign Immunity. The Nation does not by enacting this Ordinance waive in any respect its sovereign immunity, or that of its agents, in any manner, under any law, for any purpose, nor in any place.
2. No Right of Action. This Ordinance does not create any right, cause of action or benefit enforceable at law or in equity by any person against the Nation, its agencies, its officers or employees, or any other person.
3. Appeal. Appeal from an adverse decision by the Commission may be taken in accordance with such procedures as established by

the Nation. Any decision under this ordinance is not subject to review, enforcement or modification in any state or federal court or by any authority outside the Nation.

Article 6 - Effective Date

This Ordinance is effective upon enactment by Tribal Council Resolution No. _____, attached.

Appendix I

Site of Niagara County Gaming Facility

The Niagara Falls parcel (+/- 50 acres) identified by the attached map is bounded to the North by Niagara Street, to the East by John Daly Boulevard, to the South by Rainbow Boulevard, and to the West by Third Street. Excepted from within these boundaries are those six (6) parcels owned by Saint Mary's of the Niagara Cataract Roman Catholic Church comprising a total of 1.47 acres between Fourth and Fifth Streets, North of Rainbow Boulevard and South of Duggan Drive.

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Appendix J

Specific Elements of Seneca Gaming Authority's Regulatory Responsibilities

- (1) Requirement of Class III Gaming Employee License. No person may commence or continue employment as a Class III Gaming Employee unless such person is the holder of a valid current Class III Gaming Employee License issued by the Seneca Gaming Authority ("SGA"). The Nation, as a governmental entity, is not subject to this licensing requirement. The procedure for issuance of a Class III Gaming Employee License shall be as set forth in Appendix C.
- (2) Requirement of Class III Non-Gaming Employee License. No person may commence or continue employment as a Class III Non-Gaming Employee unless such person is the holder of a valid current Class III Non-Gaming Employee License issued by the SGA. The Nation, as a governmental entity, is not subject to this licensing requirement. The procedure for issuance of a Class III Non-Gaming Employee License shall be as set forth in Appendix C.
- (3) Requirement of Class III Gaming Enterprise License. No enterprise or individual may provide Class III Gaming services, Class III Gaming supplies or equipment to the Nation Gaming Operation unless such enterprise or individual is the holder of valid current Class III Gaming Enterprise License issued by the SGA. The Nation, as a governmental entity, is not subject to this licensing requirement. The procedure for the issuance of a Class III Gaming Enterprise License shall be as set forth in Appendix D.
- (4) Investigation of Non-Class III Gaming Enterprises and Other

Persons. Any enterprise or other person which provides goods, supplies or services to the Nation Gaming Operation other than Class III Gaming goods, supplies, services or equipment in a total amount exceeding the sum of \$75,000.00 in a single twelve (12) month period shall be identified by the Nation Gaming Operation to the SGA and the SGO and shall comply with the Non-Class III Gaming Registration procedures set forth in Appendix E and shall cooperate with the SGA, the SGO and the law enforcement agency in any investigation deemed necessary by either such agency relative to the fitness of such person or enterprise to engage in business with the Nation Gaming Operation, according to the procedures set forth in Appendix E. The SGA may bar such person or enterprise from providing goods or services to the Nation Gaming Operation upon a determination that such person or enterprise or a principal thereof is a person or entity whose prior activities, criminal record, if any, or reputation, habits and associations pose a threat to the effective regulation of gaming or create or enhance the dangers of unfair or illegal practices, methods and activities in the conduct of gaming; provided, however, that such person or enterprise may appeal such determination in the manner set forth in Appendix E.

(5) Age Limitation.

- (a) No person under the age of eighteen (18) years may play or be present in any room in which Class III Gaming is offered in a Gaming Facility pursuant to this Compact, provided that such underage person may be directly escorted by a person of eighteen (18) years of age or older through a room in which Class III Gaming is offered for the sole purpose of reaching non-Class III Gaming

areas. Applicable restriction(s) shall be prominently displayed on any entrance leading to Class III Gaming areas.

- (b) Notwithstanding the foregoing, the conduct of pull-tabs and keno games of chance may occur in eating establishments when minors are present so long as procedures are in place that safeguard against underage individuals from participating in those gaming activities. Such procedures shall be approved in writing by the SGA prior to permitting such games of chance at eating establishments. SGA shall provide copies of such procedures to SGO upon written request.

- (6) Possession of Firearms Prohibited. No person, including security department personnel, shall possess, or be permitted to possess any firearm within any Gaming Facility without the prior express written consent of both the Nation Law Enforcement Agency and the State, except for duly authorized personnel of each. The SGA shall post in a conspicuous location at every entrance to each Gaming Facility, a sign stating: "No person shall possess any firearm within this Gaming Facility."

- (7) Patron Dispute Resolution.
 - (a) Whenever the Nation or its agents refuse payment to a patron of alleged winnings from any Class III Gaming, the patron shall be advised of his or her right to request, within thirty (30) days of the date of the refusal, resolution by inspectors of the SGA, and if dissatisfied with the proposed resolution, to seek appeal to the

commissioners of the SGA.

- (b) Upon request by a patron, the SGA shall conduct an appropriate investigation and render a decision whether payment of the alleged winnings should be made. SGA may request assistance from the SGO in any such investigation. The decision shall be issued within sixty (60) days of the patron's request, shall be in writing, shall be based on the facts surrounding the dispute, and shall set forth the reasons for the decision.
- (c) If the patron is dissatisfied with the SGA decision or if no decision is rendered within the sixty (60) day period specified in subparagraph (b) above, the patron may request that the dispute be settled by formal hearing before the commissioners of the SGA. At such hearing, the patron shall have a right to be represented by counsel at the patron's expense, to present oral testimony, to call and question witnesses and to present documentary or other evidence. If the alleged winnings are found to be a result of a mechanical, electronic or electromechanical failure that is not due to the intentional acts of gross negligence of the Nation Gaming Operation or its agents, the SGA shall deny the patron's claim for the winnings, but shall award reimbursement of the amounts wagered by the patron which were lost as a result of said failure.
- (d) SGA shall formally notify the SGO of the pendency of any hearing and the final determination of each dispute as rendered by the SGA.

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