



# United States Department of the Interior

OFFICE OF THE SECRETARY

Washington, DC 20240

MAR 3 1 2022

The Honorable Keith B. Anderson  
Chairman, Shakopee Mdewakanton Sioux  
Community of Minnesota  
2330 Sioux Trail NW  
Prior Lake, Minnesota 55372

Dear Chairman Anderson:

On February 15, 2022, the Shakopee Mdewakanton Sioux Community of Minnesota (Tribe) and the State of Minnesota (State) submitted the Fourth Amendment to Technical Standards in Tribal-State Compact for Control of Class III Video Games of Chance on the Shakopee Mdewakanton Sioux Community Reservation in Minnesota (Amendment), providing for the regulation of class III gaming activities by the Tribe. The Amendment authorizes the Tribe to operate a cashless wagering system with class III video games of chance on the Shakopee Mdewakanton Sioux Community Reservation in Minnesota and updates the Compact to reflect this change.

We completed our review of the Amendment and conclude that it does not violate the Indian Gaming Regulatory Act (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. 25 U.S.C. § 2710(d)(8)(B). Therefore, pursuant to my delegated authority and Section 11 of IGRA, I approve the Amendment. 25 U.S.C. § 2710(d)(8)(A). The Amendment takes effect when the notice of this approval is published in the Federal Register. 25 U.S.C. § 2710(d)(3)(B).

A similar letter is being sent to Commissioner Harrington, Minnesota Department of Public Safety.

Sincerely,

Wizipan Garriott  
Principal Deputy Assistant Secretary - Indian Affairs  
Exercising by delegation the authority of the  
Assistant Secretary Indian Affairs

Enclosure

**FOURTH AMENDMENT TO  
TECHNICAL STANDARDS IN  
TRIBAL-STATE COMPACT FOR CONTROL  
OF CLASS III VIDEO GAMES OF CHANCE  
ON THE SHAKOPEEMDEWAKANTON  
SIOUX COMMUNITY RESERVATION IN MINNESOTA**

Pursuant to Section 6.12 of the Tribal-State Compact for Control of Class III Video Games of Chance on the Shakopee Mdewakanton Sioux Community Reservation in Minnesota (the "Compact"), the State of Minnesota, by and through its Commissioner of Public Safety, and the Shakopee Mdewakanton Sioux Community (the "Community") agree to amend the Compact as follows, for the express and limited purpose of allowing the Community to offer cashless wagering beyond the currently authorized ticketing technology.

Section 6.9(6), as previously amended by the Second Amendment to Technical Standards in Tribal State Compact for Control of Class III Video Games of Chance on the Shakopee Mdewakanton Sioux (Dakota) Community in Minnesota, dated September 17, 2002 ("Cashless Ticket Amendment"), is amended to read:

"Approved Coin and Bill Acceptors. At least one electronic or mechanical coin acceptor must be installed in or on each video game of chance, with the exception of cashless devices. The video games of chance may also contain token or bill acceptors, or cashless ticket acceptors, or other cashless system interface devices as well as cashless ticket dispensers, for denominations determined by the Community. Prior to operation within the Community, all models of coin, token, bill, cashless system interface devices, or cashless ticket acceptors and cashless ticket dispensers installed must have been tested and approved in writing by a gaming test laboratory as provided in Section 6."

Section 6.9(11), as previously amended by the Cashless Ticket Amendment, is amended to read:

"Printed Record of Credits and Payouts Required. A single printing mechanism, which must be capable of printing an original ticket which provides permanent sequential tracking, and which permits monitoring of error conditions on a printed medium for future use, and which records the following information: (a) the value of the credits in dollars and cents; (b) the cash paid by the device, and (c) any other data required by the Community, shall be permitted to be installed in each device. Video games of chance utilizing coin drop hoppers and that accept and issue cashless tickets or cashless transfers are permitted, provided they are monitored by a slot management/reporting system of the type described in this compact which has been approved by an independent gaming test laboratory as provided in Section 6."

Section 6.9(16), as previously amended by the Cashless Ticket Amendment, is amended to read:

"No Credit Card Meters Permitted. No video game of chance may be equipped with a device which permits the player to use a credit card rather than currency, tokens, coins, cashless tickets, or cashless electronic credits to activate the game."

The initial paragraph in Section 6.9(17), which section was added in the Cashless Ticket Amendment, is amended to read as stated below, while the remainder of the section shall remain intact:

"Cashless Video Games of Chance. The following technical standards are applicable for video games of chance that accept coins, tokens, currency, cashless transfers or cashless tickets. These video gaming devices and the associated equipment must be tested and approved by a gaming test laboratory as provided by Section 6. In order to ensure that the cashless system, and the cashless video games of chance, are properly functioning prior to public play, the State of Minnesota, through its Commissioner of Public Safety, will test and certify the cashless video games of chance operated as part of an initial installation of the cashless system. This requirement shall apply only to those video games of chance which are part of the initial installation of devices on a cashless system, and shall not apply to subsequent additions of video gaming devices to such a cashless system. Nothing contained in this provision is intended to, nor does, modify, alter or otherwise restrict the authority of the State of Minnesota, through its Commissioner of Public Safety, to conduct those inspections contemplated by Section 4.4 of the Tribal-State Compact for control of Class III Video Games of Chance on the Shakopee Mdewakanton Sioux (Dakota) Community in Minnesota."

Section 6.10(7), which was added in the Cashless Ticket Amendment, is amended to read:

"Meter Modifications for Cashless Video Games of Chance. To account for cashless transfers and cashless tickets accepted by a gaming device, information recorded by the electronic gaming device meters or the slot management/reporting system shall include:

- (a) Total value of all items accepted;
- (b) Total number of all items accepted;
- (c) The "drop" meter, which shall maintain a cumulative count of the following:
  1. Number of coins that have been diverted into a drop bucket.
  2. Number of bills by denomination.
  3. Cashless tickets inserted into the bill acceptor.
  4. Cashless transfers downloaded for play.

It is acceptable to have both a coins-dropped meter and a bills-dropped meter. The game shall have a separate meter that accumulates the number of cashless tickets accepted, not including bills;

- (d) A separate meter that accumulates and increments the total value of cashless tickets accepted, not including bills which are included in section (c) above; and
- (e) A separate meter that accumulates and increments by the value of cashless transfers to, and from, the cashless system. Specific meters may be required to track the different types of cashless credits."

Paragraph 7 of the Cashless Ticket Amendment is amended to read as set forth below, and shall hereafter be known as Section 6.10(8):

"Prior to public use of those video gaming devices activated by cashless electronic credits or cashless tickets installed by the Community in its gaming facilities, the Community shall adopt minimum internal control standards ("MICS") governing the use by the Community of such video gaming devices. The controls imposed by the MICS adopted by the Community on the operation and use of video gaming devices activated by cashless electronic credits or cashless tickets shall be no less stringent than those proposed by the National Indian Gaming Commission for use with cashless technology."

A new Section 6.9(18) is added:

"The cashless gaming device must be able to support secure communication with the cashless system and allow for the tracking and accounting of all supported cashless transaction types. In the event of a loss of communication or detection of an error in communication between the device and system, an appropriate error should be logged and result in an appropriate tilt.

The cashless gaming devices or the cashless system must have the ability to recall the last twenty-five (25) cashless transfers received from the system and the last twenty-five (25) cashless transfers transmitted to the host system. The following information must be displayed:

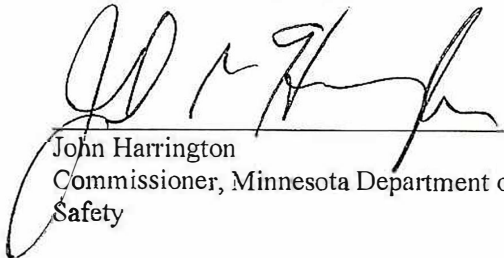
- (a) The type of transaction (upload/download) including restrictions (cashable or non-cashable, etc.);
- (b) Transaction value;
- (c) Time and date;
- (d) The player account number or a unique identifier, either of which can be used to authenticate the source of the funds (i.e. source of where the funds came from/went to.)"

The following definitions are added to Section 6.14:

- (5) "Cashless electronic credits" means electronic credits transferred by, to or from the cashless system.
- (6) "Cashless transfers" means transfers of electronic credits by, to or from the cashless system.
- (7) "Cashless gaming device" means a video game of chance that can process cashless transfers of cashless electronic credits.
- (8) "Cashless system" means software and hardware that facilitate the transfer of cashless electronic credits to and from a cashless gaming device.

[signature page to follow]


Dated: 01/25/2022  
STATE OF MINNESOTA

  
John Harrington  
Commissioner, Minnesota Department of Public  
Safety

Dated: December 15, 2021  
SHAKOPEE MDEWAKANTON SIOUX  
COMMUNITY

  
Keith B. Anderson  
Chairman

3-31-22  
Date

  
Wizipan Garriott  
Principal Deputy Assistant Secretary- Indian Affairs,  
Exercising by delegation the authority of the Assistant  
Secretary - Indian Affairs.