

**BAY MILLS INDIAN COMMUNITY**  
**GAMING COMMISSION RULES**

**RULE 19: SENSITIVE AREA ACCESS CONTROLS**

(a) **Sensitive Area Defined.**

(1) Locations. The following locations in a gaming establishment constitute a sensitive area subject to this Rule:

- (i) Surveillance Department;
- (ii) Cage;
- (iii) Vault;
- (iv) Pit;
- (v) Employee window areas adjoining the cage;
- (vi) Slot Technician room;
- (vii) Surveillance Technician room;
- (viii) Hard and soft count rooms and, if the area is used to store carts with cashboxes or drop boxes, the vestibule adjoining each count room, commonly termed "mantrap";
- (ix) Computer equipment room; and
- (x) Slot machine storage room.

(2) Equipment. The following types of equipment in a gaming establishment constitute a sensitive area subject to this Rule:

- (i) Slot machine;
- (ii) Gaming equipment and supplies;
- (iii) Online slot/accounting systems;
- (iv) Kiosk-Cage; and
- (v) Kiosk-Marketing.

(b) **Restrictions on Sensitive Area Access.** Unless specifically authorized by the Gaming Commission, access

to all sensitive areas is restricted to those persons who are primary management officials or who are key employees licensed for such access. Each gaming establishment shall maintain a list of all sensitive areas contained within it and those persons for whom access is authorized by the gaming license issued to them by the Gaming Commission.

(c) **Authorization by Gaming Commission for Access to Sensitive Areas.** Sensitive area access may be authorized by the Gaming Commission for specific purposes by issuance of an access pass, of the following types:

(1) Employee Pass. An employee of the Bay Mills Indian Community may be authorized access to a specific sensitive area for the purpose of carrying out employment-related duties, inspections or maintenance. Such authorization shall be requested by the employee's supervisor, and documented by issuance of an Employee Pass by the Gaming Commission, which is valid solely for the date of issuance. The form and content of the Employee Pass shall be determined by the Gaming Commission, provided that the Pass clearly identifies the sensitive area for which access is granted.

(2) Vendor Pass. An employee of a vendor who provides goods or services to the gaming establishment may be authorized access to a sensitive area, which shall be documented by the issuance of a Vendor Pass by the Gaming Commission, under the following conditions:

(i) No Vendor Pass may be issued to any person without initiation of a background investigation.

(ii) A Vendor Pass shall not be provided to any vendor employee whose background investigation demonstrates that:

(a) Within the immediately preceding five (5) years, the person has been convicted of or entered a plea of guilty or no contest to a crime which constitutes a felony under the laws of the United States or of the State of Michigan; or

(b) The person has been convicted of or entered a plea of guilty or no contest to a gambling-related offense, or to an offense involving fraud or misrepresentation, as such term is defined in Gaming Rule 2(b)(4).

(iii) A Vendor Pass is valid for a period of one (1) year from the date of issuance.

(3) Visitor Pass. Any person at least 18 years of age may be authorized access to a specific sensitive area upon request of a primary management official or member of the Gaming Commission. Such authorization shall be documented by issuance of a Visitor Pass by the Gaming Commission, which is valid solely for the date of issuance.

(4) Federal/ State Employee Pass. An employee of the Michigan Gaming Control Board, the National Indian Gaming Commission, the Internal Revenue Service, or any other federal agency with jurisdiction over activities conducted in the gaming facility, shall, upon request and the submission of employee status documentation, be authorized access to specific sensitive areas on a specific date, documented by issuance of a Federal/ State Employee Pass.

(d) **Restrictions on Utilization of Pass.**

(1) Sensitive Area Escort. Any person to whom an Employee or Vendor Pass has been issued shall be accompanied by a key employee of the Department which maintains the sensitive area for which access is authorized. A person to whom a Visitor Pass is issued must be escorted by the General Manager, the Director of Security, a member of the Gaming Commission, or Commission staff.

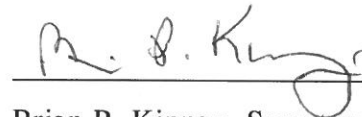
(2) Security Department Escort Required. Access by any person issued an Employee, Vendor or Visitor Pass shall not be provided to the cage, vault, or mantrap unless the person is escorted by an employee of the Security Department in addition to the escort requirements of subsec. (1), above.

(3) Hard and Soft Count Rooms. Access to the Hard and Soft Count Rooms shall be denied to any person during the count process; provided, that a Vendor Pass may be issued by the Gaming Commission upon the provision of documentation that a count machine or other count equipment requires immediate service or repair by an employee of the Vendor. A person to whom an Employee or Vendor Pass is issued may enter the count rooms through the cage when no currency is present in the room. No security escort is required in the count rooms when no currency is present if Surveillance is notified that maintenance is being performed on the count machines and constant coverage is maintained by Surveillance personnel while the person is in the count rooms.

(e) **Display of Pass.** A Pass shall be in a format and size determined by the Gaming Commission, and may contain a photograph of the individual on its face. A Pass shall be designed to be worn on the upper torso of the holder, with all relevant information displayed on its face.

#### CERTIFICATION

This is to certify that the above Gaming Commission Rule #19, as amended by deleting Sec. (a)(1)(xi), has been reviewed and approved at a meeting of the Bay Mills Executive Council held at Bay Mills, Michigan, on the 8th day of April, 2019, with a vote of 4 in favor, 0 opposed, 0 absent, and 1 abstaining. The President must abstain except in the event of a tie.



Brian P. Kinney, Secretary  
Bay Mills Executive Council