

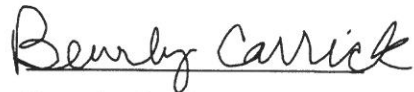
**BAY MILLS INDIAN COMMUNITY**  
***GAMING COMMISSION RULES***

**RULE 14:    *TRIBAL INTERNAL CONTROLS STANDARDS***

The attached amendments to the standards for the conduct of Class III gaming by persons subject to the jurisdiction of the Bay Mills Indian Gaming Commission are determined to comply with applicable regulations of the National Indian Gaming Commission. The amended standards are hereby enacted as a regulation/rule of the Commission.

**CERTIFICATION**

This is to certify that the above Gaming Commission Rule #14, as amended through amendments to sec. IV.D.2. and sec. VIII.C.-H. and rescission of sec. XIII, has been reviewed and approved at a meeting of the Bay Mills Executive Council held at Bay Mills, Michigan, on the 14th day of June, 2021, 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.



Beverly Carrick, Secretary  
Bay Mills Executive Council

#### IV. CARD GAMES

- A. Computer applications: For any computer applications utilized, alternate documentation and/or procedures that provide at least the level of control described by the standards in this section, as approved by the, Tribal Gaming Commission, will be acceptable.
- B. Hours of operation: The Tribal Gaming Commission shall be notified of the hours of operation of the card room and any changes thereto should hours differ from that of the gaming facility.
- C. Rules of Play: Rules of play for card games shall be prominently displayed.
- D. Standards for drop and count.
  1. As approved by the Tribal Gaming Commission, the gaming operation shall establish procedures for the collection of the card game drop.
  2. MICS XIV (~~BD~~) also applies to card game count procedures.
- E. Standards for supervision.
  1. Supervision shall be provided at all times when the card room is in operation by personnel with authority equal to or greater than those being supervised.
  2. Exchanges between table banks and the main card room bank (or cage, if a main card room bank is not used) in excess of \$100.00 shall be authorized by a supervisor. All exchanges shall be evidenced by the use of a lammer unless the exchange of chips, tokens, and/or cash takes place at the table.
  3. Exchanges from the main card room bank (or cage, if a main card room bank is not used) to the table banks shall be verified by the card room dealer and the runner.
  4. If applicable, transfers between the main card room bank and the cage shall be properly authorized and documented.
  5. A rake collected or ante placed shall be done in accordance with the posted rules.
  6. Access to the pit podium/stand shall be secured as to prevent unauthorized access if it is utilized for the storage of sensitive supplies/equipment such as playing cards, playing chips, fill slips, etc. A listing of positions authorized access the pit podium/stand shall be maintained and a copy provided to surveillance and made available to the Tribal Gaming Commission.
- F. Standards for keys. MICS XV (J) applies to standards for keys.
- G. Standards for playing cards.
  1. Playing cards shall be maintained in a secure location to prevent unauthorized access and to reduce the possibility of tampering.
  2. Used cards shall be maintained in a secure location until marked, scored, or destroyed, in a manner approved by the Tribal Gaming Commission, to prevent unauthorized access and reduce the possibility of tampering.
  3. The marking, canceling or destruction of cards shall be conducted within seven (7) days of removal from play.
    - a. This standard shall not apply where playing cards are retained for an investigation.
  4. A card control logs shall be maintained that documents when cards and dice are received on site, distributed to and returned from tables and removed from play by the gaming operation.
  5. A listing of positions authorized to access cards per paragraphs (G)(1) & (G)(2) of this section shall be maintained. The access listing shall be provided to surveillance department and made available to the Tribal Gaming Commission upon request.

H. Plastic cards.

1. Plastic cards shall follow the same playing cards standards listed (G)(1) through (5) of this section.
2. Plastic cards (not plastic-coated cards), may be used for up to three (3) months if the plastic cards are routinely inspected, and washed or cleaned in a manner and time frame approved by the Tribal Gaming Commission.
3. Cleaning procedures shall include:
  - a. Listing of staff authorized to clean
  - b. documentation of staff that performed the cleaning
  - c. documentation of date and time of cleaning

I. Standards for shills.

1. Issuance of shill funds shall have the written approval of the supervisor.
2. Shill returns shall be recorded and verified on the shill sign-out form.
3. The replenishment of shill funds shall be documented.

J. Standards for reconciliation of card room bank.

1. The amount of the main card room bank shall be counted, recorded, and reconciled on at least a per shift basis.
2. At least once per shift, the table banks that were opened during that shift shall be counted, recorded, and reconciled by a dealer or other person, and a supervisor, and shall be attested to by their signatures on the check-out form.

K. Standards for promotional progressive pots and pools.

1. All funds contributed by players into the pools shall be returned when won in accordance with the posted rules with no commission or administrative fee withheld.
2. Rules governing promotional pools shall be conspicuously posted and designate:
  - a. The amount of funds to be contributed from each pot;
  - b. What type of hand it takes to win the pool (e.g., what constitutes a "bad beat");
  - c. How the promotional funds will be paid out;
  - d. How/when the contributed funds are added to the jackpots; and
  - e. Amount/percentage of funds allocated to primary and secondary jackpots, if applicable.
3. Promotional pool contributions shall not be placed in or near the rake circle, in the drop box, or commingled with gaming revenue from card games or any other gambling game.
4. The amount of the jackpot shall be conspicuously displayed in the card room.
5. At least once a day, the posted pool amount shall be updated to reflect the current pool amount.
6. At least once a day, increases to the posted pool amount shall be reconciled to the cash previously counted or received by the cage by personnel independent of the card room.
7. All decreases to the pool must be properly documented, including a reason for the decrease.

L. Promotional progressive pots and pools where funds are displayed in the card room.

1. Promotional funds displayed in the card room shall be placed in a locked container in plain view of the public.
2. Persons authorized to transport the locked container shall be precluded from having access to the contents keys.
3. The contents key shall be maintained by personnel independent of the card room.
4. At least once a day, the locked container shall be removed by two persons, one of whom is independent of the card games department, and transported directly to the cage or other secure room to be counted, recorded, and verified.

5. The locked container shall then be returned to the card room where the posted pool amount shall be updated to reflect the current pool amount.
- M. Promotional progressive pots and pools where funds are maintained in the cage.
1. Promotional funds removed from the card game shall be placed in a locked container.
  2. Persons authorized to transport the locked container shall be precluded from having access to the contents keys.
  3. The contents key shall be maintained by personnel independent of the card room.
  4. At least once a day, the locked container shall be removed by two persons, one of whom is independent of the card games department, and transported directly to the cage or other secure room to be counted, recorded, and verified, prior to accepting the funds into cage accountability.
  5. The posted pool amount shall then be updated to reflect the current pool amount.
- N. Card Game Inventory
1. The Director of Gaming shall notify the Gaming Commission in writing 30 days prior to when a card game will be put into play. The notice shall have the following information:
    - a. Identity of manufacturer,
    - b. Date in which will be put into play,
    - c. Rules for game
  2. The Director of Gaming shall notify the Gaming Commission in writing 3 days prior to when a card game will be taken out of play. The notice shall have the following information:
    - a. Location of where game is going,
    - b. Date in which will be taken out of play,
    - c. Reason game was taken out of play.
- O. Subject to Gaming Commission approval, the Gaming Operation shall establish and implement the following procedures:
1. Any employee acting as a dealer or as a table banker shall display both hands in a manner observable by surveillance camera before removing either hand from the table game.
  2. Set a standard for card shuffles for each type of game.
  3. Require the same payment method for each bet.
- P. Subject to Gaming Commission approval, the gaming operation shall establish procedures to ensure that currency and tips received from a patron in the card room area is promptly placed in a designated locked box for each game. Procedures shall include the specific designated area where the drop box will be located.
- Q. Subject to Gaming Commission approval, the gaming operation shall establish procedures for securing card game chips and currency for the Card Room. Procedures should include opening and closing of the each game.

## VIII. CAGE

- A. Computer Applications. For any computer application utilized, alternate documentation and/or procedures that provide at least the level of control described by standards in this section, as approved by the Gaming commission, will be acceptable.
- B. Cash and Foreign Currency
1. The gaming operation shall establish procedures to ensure the authenticity of large bills accepted in the cage.
  2. The gaming operation shall establish procedures for the acceptance and/or the exchange of foreign currency.
- C. Check acceptance and cashing
1. The Tribal Gaming Commission shall approve the types of checks cashed at each gaming operation.
  2. The gaming operation, as approved by the Tribal Gaming Commission, shall establish procedures and appropriate controls over the acceptance and cashing of personal checks, cashier's checks, payroll checks or other checks per (C)(1) of this section .
  3. ~~MICS XVII (O)(6) applies to the collection and recording of checks.~~ The gaming operation, as approved by the Tribal Gaming Commission, shall establish procedures for the acceptance of personal checks, collecting and recording checks returned to the gaming operation after deposit, re-deposit, and write-off authorization.
  4. When counter checks are issued, the following shall be included on the check:
    - a. The customer's name and signature;
    - b. The dollar amount of the counter check (both alpha and numeric);
    - c. Customer's bank name and bank account number;
    - d. Date of issuance; and
    - e. Signature or initials of the person approving the counter check transaction.
  5. When traveler's checks or other guaranteed drafts such as cashier's checks are presented, the cashier shall comply with the examination and documentation procedures as required by the issuer.
- D. Customer deposited funds. If a gaming operation permits a customer to deposit funds with the gaming operation at the cage, the following standards shall apply.
1. The receipt or withdrawal of a customer deposit shall be evidenced by at least a two-part document with one copy going to the customer and one copy remaining in the cage file.
  2. The multi-part receipt shall contain the following information:
    - a. Same receipt number on all copies;
    - b. Customer's name and signature;
    - c. Date of receipt and withdrawal;
    - d. Dollar amount of deposit/withdrawal; and
    - e. Nature of deposit (cash, check, chips); however,
    - f. Provided all of the information in paragraph (D)(2)(a) through (e) is available, the only required information for all copies of the receipt is the receipt number.
  3. The gaming operation as approved by the Tribal Gaming Commission, shall establish procedures that:
    - a. Maintain a detailed record by customer name and date of all funds on deposit;
    - b. Maintain a current balance of all customer cash deposits that are in the cage/vault inventory or accountability; and
    - c. Reconcile this current balance with the deposits and withdrawals at least daily.

4. The gaming operation, as approved by the Tribal Gaming Commission, shall describe the sequence of the required signatures attesting to the accuracy of the information contained on the customer deposit or withdrawal form, ensuring that the form is signed by the cashier.
  5. All customer deposits and withdrawal transactions at the cage shall be recorded on a cage accountability form on a per-shift basis.
  6. Only cash, cash equivalents, chips, and tokens shall be accepted from customers for the purpose of a customer deposit.
  7. The gaming operation as approved by the Tribal Gaming Commission, shall establish procedures that verify the customer's identity, including photo identification.
  8. A file for customers shall be prepared prior to acceptance of a deposit.
- E. Accountability standards.
1. All transactions that flow through the cage shall be summarized on a cage accountability form on a per shift basis and shall be supported by documentation.
  2. The cage and vault (including coin room) inventories shall be counted by the oncoming and outgoing cashiers. These employees shall make individual counts for comparison of accuracy and maintenance of individual accountability. Such counts shall be recorded at the end of each shift during which activity took place and shall include sufficient information that identifies the individual employee and the station.
  3. Review and verification of documents generated by the accountability standards and discrepancies. ~~MICS XVII (O)(9)(e) applies to the review, verification and discrepancies of the accountability standards.~~
  4. ~~MICS XVII (L) applies to the Bankroll Formula.~~
  5. The gaming operation, as approved by the Tribal Gaming Commission, shall establish procedures for the transfer and/or deposit of currency, coin or tokens off facility property.
- F. Chip and token standards.
1. The gaming operation as approved by the Tribal Gaming Commission, shall establish procedures for the receipt, inventory, storage, and destruction of gaming chips and tokens.
  2. The gaming operation shall notify the Tribal Gaming Commission when chips or tokens are ordered. Notice shall include amount, denomination and date of order.
  3. The gaming operation, as approved by the Tribal Gaming Commission, shall establish procedures for the inventory, storage and destruction or disposal of gaming chips and tokens belonging to gaming properties not licensed by the Bay Mills Gaming Commission.
- G. ~~Coupon standards. MICS XVI (D) applies to coupon standards.~~
- H. ~~Accounting/auditing standards. MICS XVII (O) applies to cage accounting/auditing standards.~~
- I. Extraneous items. The gaming operation as approved by the Tribal Gaming Commission, shall establish procedures to address the transporting of extraneous items, such as coats, purses, and/or boxes, into and out of the cage, coin room, count room, and/or vault. A list of authorized items shall be provided to the Tribal Gaming Commission and surveillance personnel.
- J. Kiosk-Cage
1. Kiosk (kiosk-cages) must be maintained on the cage accountability and must be counted independently by at least two agents, documented, and reconciled for each increase or decrease to the kiosk-cage inventory.



2. Subject to Gaming Commission approval, the gaming operation shall establish procedures for the following:
  - a. Currency accepted
  - b. Replenishing currency at the Kiosk-Cage
  - c. Fill
  - d. Hopper Drop
  - e. Reconciliation
    1. Starting balance dollar amount per financial instrument;
    2. Starting balance number of items per financial instrument;
    3. Dollar amount per financial instrument issued;
    4. Number of items per financial instrument issued;
    5. Number of items per financial instrument redeemed;
    6. Dollar amount per financial instrument increases;
    7. Number of items per financial instrument increases;
    8. Dollar amount per financial instrument decreases;
    9. Number of items per financial instrument decreases;
    10. Ending balance dollar amount per financial instrument; and
    11. Ending balance number of items per financial instrument.
  - f. Bill Jam's
  - g. Rejected Currency and Vouchers/Tickets
  - h. Upgrades
  - i. Physical security controls over the kiosk-cages and access to them. Controls should address the following:
    1. Forced Entry
    2. Evidence of any entry
    3. Protection of circuit boards containing programs
  - j. Minimum and maximum payout
3. Currency cassettes must be counted and filled by a cage employee and verified independently by at least one additional cage employee, all of whom must sign each cassette documentation record.
4. Currency cassettes must be secured inside a kiosk-cage or must be stored in a secured area of the cage/vault.
5. Subject to Gaming Commission approval, the gaming operation shall ensure that information between the kiosk-cage and slot accounting system is adequately functioning and secure.