Mille Lacs Band of Ojibwe Indians
Gaming Regulatory Authority
Detailed Gaming Regulations

VIDEO GAMES OF CHANCE

Document No. DGR – 11   **Effective: October 19, 2017**

I.   SCOPE.

This section includes the Detailed Gaming Regulations for Video Games of Chance (VGCs) to be regulated and played in compliance with Title 15 of the Mille Lacs Band Statutes Annotated.

II.   GAME REGULATIONS APPLICABLE TO VIDEO GAMES OF CHANCE (VGCs).

A Gaming Enterprise shall comply with all requirements set forth in the Tribal State Compact for Control of Class III VGCs on the Mille Lacs Band of Ojibwe Reservation in Minnesota (Compact), subsequent technical amendments, applicable Federal Regulations and Mille Lacs Band Detailed Gaming Regulations.

Section 1. The Gaming Enterprise shall implement a System of Internal Control Standards (SICS), as approved by the Gaming Regulatory Authority (GRA) Board.

Section 2. Subsequent revisions to the SICS must be provided to the GRA thirty (30) days prior to implementation.

Section 3. The GRA reserves the right to require changes to any internal control or procedure to ensure compliance with applicable laws and regulations.

Section 4. Approval of VGCs. No VGCs may be purchased, leased or otherwise acquired by a Gaming Enterprise unless:

A. The video game of chance is purchased, leased or acquired from a manufacturer or distributor licensed to sell, lease or distribute video games of chance by the GRA Board; and

B. The VGC, or a prototype thereof, has been tested, approved or certified by an independent gaming testing laboratory (ITL) as meeting the requirements and standards of these Regulations and the Compact.

    1. The ITL approval report shall indicate the type and robustness of the Random Number Generator.

    2. The ITL approval report shall indicate the compatible components the software was evaluated with.

III.   VGC AND RELATED EQUIPMENT CONTROLS.

The Gaming Enterprise shall establish and implement procedures to safeguard the integrity of VGCs, related equipment and software.

Section 1. Shipping and Receiving. The Office of Gaming Regulation and Compliance (OGR&C) shall establish and implement procedures for the shipping and receiving of VGCs, related equipment, and software. Gaming system components shall be shipped in a secure manner to deter unauthorized access.

A. The Gaming Enterprise shall notify the OGR&C of any pending shipments. Such notification shall be made when the order is forwarded to the supplier.

B. The vendor shall notify the OGR&C and appropriate Gaming Enterprise department of the expected shipping date at least five (5) calendar days prior to shipment or removal of VGCs, related equipment, and software packages. The five day notification may be waived at the discretion of OGR&C management with notification to the appropriate Gaming Enterprise department. Such notification shall include, but is not limited to, the following information:

1. Name and address of the supplier;
2. Description of shipment;
3. Serial number of Video Games of Chance;
4. Amount and program identification numbers for game control media (software);
5. Method of delivery (i.e. EPROM chips, download, e-mail attachment, etc.); and
6. Expected date of shipment and delivery.

C. The OGR&C, or its designee, accompanied by an authorized VGC department associate escorted by Security, must receive all gaming system components and game play software packages, and verify the contents against the shipping notification. Such verification shall take place as soon as practical, but no later than the next business day.

Section 2. Software Storage Controls.

A. Software or hardware that is required to change any parameter on VGCs or related equipment shall be secured in a dual locked cabinet with access restricted to Security and the OGR&C. All such software and hardware shall be logged into and out of the cabinet according to OGR&C procedures. Any hardware switches that allow changing of parameters or clearing of meters shall be secured per OGR&C instructions.

B. All other secured gaming software shall be secured in a dual locked cabinet with access restricted to authorized VGC and Security department associates. All software shall be logged into and out of the cabinet.

C. Software logs shall include the following:
    1. Date out/Date in;
    2. Time out/Time in;
    3. Software I.D./version and amount/number;
    4. Reason;
    5. Initials of associate issuing the software; and
    6. Signature and file number of associates involved.

D. At least quarterly, inventories must be conducted on software storage cabinets and the results forwarded to GRAOGRCnotifications@grcasinos.com. Any discrepancies in the inventory (difference between what was expected and what was present) must be investigated and the results of such investigation forwarded to GRAOGRCnotifications@grcasinos.com.
    1. Software that is classified as Non-Mandatory Upgrade (NU) or no longer going to be used on the gaming floor does not have to be inventoried quarterly provided it is verified, sealed, and stored in a dual controlled area that is separate from all other software.
    2. A log or other permanent form of documentation will be used to indicate exactly what software is contained in this storage area.

Section 3. Software Signature Verification. The OGR&C shall establish and implement procedures to compare signatures generated by the verification programs to the signatures provided by the ITL. Such verification shall take place as soon as practical.

A. Software verification discrepancies must be investigated and resolved prior to the software being installed in a VGC or being offered for play.

    B. A representative of the OGR&C, accompanied by a VGC department associate escorted by Security, must be present to verify and remove the tape of pre-verified software prior to placement into VGCs or related equipment.

Section 4. <u>Duplication of VGC and Related Equipment Software.</u> Procedures must be implemented by the Gaming Enterprise for the duplication of ITL approved software for VGCs and related equipment.

    A. A log must be maintained that includes:
        1. Date;
        2. VGC number (source and destination);
        3. Manufacturer;
        4. Program number;
        5. Associates involved;
        6. Reason for duplication; and
        7. Disposition of permanently removed software.

    B. Any duplication of proprietary information must be authorized by written documentation from the owner of the information.

    C. OGR&C must be notified prior to duplication of any ITL approved software.

    D. Software listed as revoked or NU by the ITL shall not be duplicated.

Section 5. <u>VGC Access.</u>

    A. All associates accessing meters (other than when performing the bill validator drop), performing game recalls, or accessing the interior of the VGC shall communicate their access/activity by inserting their access card into the VGC's card reader.

    B. Except for access involving scheduled drops, all access to VGCs shall be documented by the associate who opened the VGC on a Machine Entry Access Log (MEAL).

    C. MEAL entries shall be complete and legible. Entries in the log shall include, but are not limited to:
        1. Bank and stand;
        2. Date placed into and/or removed from service;
        3. Date and time of entry;
        4. Signature and file number of the associate entering the VGC; and
        5. Reason for entry.

    D. MEALs may not contain codes for the types of work performed, unless they are defined in the department procedures.

    E. If kept in book form, the MEAL shall be kept inside the VGC at all times and shall be retained for at least one (1) year after the VGC is removed from service and/or disposed of.

    F. MEALs shall be archived in a manner which they can be immediately retrieved.

    G. The associate who opens the VGC and inserts their access card or signs the MEAL is responsible for all activity inside the VGC.

Section 6. <u>Security Tape for VGCs and Related Equipment.</u>

    A. Upon installation, a Gaming Enterprise shall affix or cause to be affixed to access sensitive areas and/or the software of each VGC and/or related equipment, a strip of sequentially numbered security tape, capable of evidencing tampering or removal.

B. The security tape shall be secured and available only to the Security Department associates.
C. Each Gaming Enterprise shall maintain a perpetual log of the security tape(s) used within each VGC or related equipment. The log, at a minimum, shall contain:
    1. VGC number;
    2. VGC serial number;
    3. Old security tape number;
    4. Date removed;
    5. Military (24 hour) time;
    6. Signature and identification number of the VGC department associate and the Security associate removing tape;
    7. New security tape number;
    8. Date replaced or initially placed;
    9. Military (24 hour) time;
    10. Signature and identification number of the VGC department associate and the Security associate placing tape; and
    11. Comments (RAM Clear, Project/area taped etc.).
D. Security tape shall be affixed to VGCs and related equipment software in a manner consistent with the recommendation of the ITL or as otherwise authorized and directed by the OGR&C.
E. Switches or jumpers on all circuit boards that have the potential to affect the outcome or integrity of any game, progressive award, financial instrument, cashless transaction, voucher transaction, or accounting records must be capable of being sealed.

Section 7. Recordkeeping.
A. The Gaming Enterprise must maintain the following records, as applicable, related to installed VGCs:
    1. Date placed into service;
    2. Date made available for play;
    3. Supplier;
    4. Software version(s) for all software installed to include, but not limited to, game, operating system, and applicable printer, bill acceptor, communications, and progressive controller software;
    5. Serial number;
    6. Game title; and
    7. Asset and/or location number (bank, stand, and machine number).

Section 8.   Random Verification of VGCs.
A. The GRA shall randomly verify currently installed VGCs against the current Slot Master. The verification shall include, but is not limited to, the following:
    1. EPROMs;
    2. Hold (PAR);
    3. Max bet;
    4. Max play lines;
    5. Denomination(s);
    6. Door access;

7. Printer limits;
8. Credit limits; and
9. Rules of play.

B. The GRA reserves the right to perform software verification (Kobe) of any currently installed VGC, as deemed necessary.

IV. VGC LICENSING.

Section 1. VGCs operated within the jurisdiction of the Band must be licensed by the GRA prior to being offered for guest play.

A. Such licensing shall include, but not be limited to, verification of:
1. Address (bank, stand, and machine number);
2. Software;
3. Configurable parameters;
4. Progressive incrementation;
5. Meter incrementation;
6. Bill, coin, ticket verification as applicable;
7. Communication verification;
8. Button art; and
9. Door access.

B. Licenses shall remain active provided there are no changes made to the original VGC. Any changes, removals from the system, moves, or RAM clears will suspend such license until testing and verification following OGR&C procedures has been performed.

C. Revoked software must be removed from the gaming floor within the recommended timelines given by the ITL, vendor or as otherwise determined by Office of Gaming Regulation and Compliance (OGR&C) Management.

D. Software listed as revoked or NU by the ITL shall not be installed on the gaming floor. If the NU software is currently installed in a VGC that is on the gaming floor, it may remain on the floor, provided the software is not removed from the VGC. If a VGC with NU software is removed from the gaming floor, and kept intact (i.e. locks and seals not removed), the VGC may be returned to the floor. Otherwise, the NU software may not be returned to the gaming floor.

Section 2. Revocation and Suspension of GRA License.

A. No VGC may be operated without a valid license issued by the GRA. A license that has been suspended or revoked is invalid.

B. If a VGC malfunctions, does not conform to technical standards, or otherwise does not meet the standards of DGR 11, Title 15, the Tribal/State Compact, and all other applicable laws and requirements, the Gaming Enterprise shall immediately notify the Director of the OGR&C. Verbal notification is acceptable, provided it is followed up with written documentation of the malfunction.

C. If a VGC malfunctions, does not conform to technical standards, or otherwise does not meet the standards of DGR 11, Title 15, the Tribal State Compact, and all other applicable laws

and requirements, the Director of the OGR&C may suspend the GRA license of the VGC pending investigation.

D. In order to restore a VGC with a suspended GRA license, the Director of the OGR&C must be satisfied that the VGC can be operated in compliance with technical standards, DGR 11, Title 15, the Tribal/State Compact and all other applicable laws and requirements.

E. If a VGC malfunctions or does not conform to technical standards, DGR 11, Title 15, the Tribal/State Compact and all other applicable laws and requirements, the GRA Board may revoke the license of the VGC.

F. In order to restore a VGC with a revoked GRA license, the GRA Board must be satisfied that the VGC can be operated in compliance with technical standards, DGR 11, Title 15, the Compact and all other applicable laws and requirements.

G. If it is not possible to make an immediate determination as to whether a VGC is in compliance, the Director of the OGR&C may suspend the GRA license of the VGC pending investigation.

Section 3.   Projects.

A. Procedures must be implemented regarding the communication of Adds, Changes, and Removals, for all VGCs.

B. Prior to any changes to VGCs or related equipment, notification to the OGR&C is required at least one day (24 hours) prior to the scheduled change, including, but not limited to the following information:
    1. Proposed change (conversion, add, remove, etc.);
    2. Serial number;
    3. Denomination;
    4. Par;
    5. Software identification numbers of the VGCs and related equipment;
    6. Maximum lines;
    7. Maximum credits;
    8. Progressive information including credits required to increment; and
    9. Pay table information.

C. Surveillance must be notified 48 hours prior to moving VGCs and/or overhead signage.

D. All signage shall reflect accurate VGC information.

E. Testing must be completed by the OGR&C as part of the project to verify that the VGC has been properly installed before the VGC is offered for guest play. The OGR&C shall create and implement procedures for the testing/verification of the VGCs. This shall include, but is not limited to, testing of the following, as applicable:
    1. Communication with the gaming system;
    2. Communication with the accounting system;
    3. Communication with the player tracking system;
    4. Currency and vouchers to bill acceptor;
    5. Voucher printing;
    6. Meter incrementation, including progressive meters;
    7. Pay table, for verification;

8. VGC/player interface denomination, for verification;
9. All buttons, to ensure that all are operational and programmed appropriately;
10. System components, if any, to ensure that they are safely installed at location; and
11. Locks, to ensure that they are secure and functioning.

Section 4. Currency Handling for Testing. All currency used for testing will be signed out at the Main Bank and requires a Security Escort.

A. The use of IVS tickets for testing is only allowable when a ticket is received from the test currency signed out. The use of found, active, IVS tickets for testing purposes is not permitted. Found tickets shall be handled according to departmental policy.

B. Logs will be maintained which, at minimum, shall require:
1. Name of associate signing out the money;
2. Name of Security Officer; and
3. Asset number currency/ticket is placed into.

C. Currency and tickets not required for testing shall be turned back into the Main Bank.

D. Security shall remain with the associate until the log, tickets, and or cash is turned in to the Main Bank.

V.   VGC MALFUNCTIONS.

Section 1. "Malfunction" shall be defined as an occurrence where a VGC and/or Related Equipment do not perform as it was designed or intended to perform. Malfunctions shall include, but not be limited to: duplicate tickets, lockups, blackouts, reboots, hard/soft RAMs, metering issues, down machines, etc.

Section 2. Procedures must be established and implemented by the GRA or Gaming Enterprise with GRA approval for responding to, monitoring, investigating, resolving, documenting and reporting VGC malfunctions. These shall include VGC department management review of malfunction logs.

Section 3. Logs documenting malfunctions including software and/or hardware malfunctions shall be maintained and submitted to GRAOGRCnotifications@grcasinos.com on a weekly basis. Logs at a minimum shall contain:

A. Date of occurrence;
B. Time of occurrence;
C. VGC serial number and location;
D. Manufacturer;
E. Main program/operating system and game software;
F. Detailed description of malfunction;
G. Detailed descriptions of each time the VGC and/or related equipment is accessed;
H. Steps taken to correct the malfunction with each access; and
I. Associate names with each access.

Section 4. RAM Clears should only be needed in extenuating circumstances and after all other avenues have been tried. If a RAM Clear process is required, all steps taken prior to the RAM Clear must be listed and the reason for the RAM Clear must be evident. A log shall be maintained which contains at minimum:

A. Date of occurrence;
B. Time of occurrence;
C. Machine Serial number and location;
D. Manufacturer;
E. Main Program and Game Software;
F. Detailed reason for RAM Clear;
G. Steps taken to resolve game issue prior to RAM Clear; and
H. All Associates involved.

Section 5. Temporary Removal of VGCs. Procedures must be implemented by the Gaming Enterprise to temporarily remove VGCs and related equipment from operation. VGCs and related equipment may remain intact (locks, software, etc.) while temporarily stored. Procedures must include notification to OGR&C that includes:

A. Serial number;
B. Storage location(s) until return to operation, as approved by OGR&C;
C. Approximate date of storage until return to operation for a time period not to exceed thirty (30) days. This time period may be extended at the discretion of OGR&C management; and
D. Reason for temporary removal.

Section 6. Permanent Removal of VGCs. Procedures must be implemented by the Gaming Enterprise to permanently remove VGCs and related equipment from operation. Procedures must include the following:

A. Notification to OGR&C that includes;
    1. Serial number;
    2. Location of storage; and
    3. Reason for permanent removal.
B. Remove, document and/or secure any or all applicable associated/related equipment such as locks, card reader, ticket printer, etc.; and
C. Remove, document and secure all software, unless otherwise approved in advance by the Director of the ORG&C or designee.

Section 7. Disposal. Procedures must be implemented by the Gaming Enterprise to dispose of VGCs, related equipment and software media. Such procedures shall include the following:

A. The Gaming Enterprise disposing of VGCs, related equipment and/or software shall provide a written notice to GRAOGRCnotifications@grcasinos.com forty-eight (48) hours in advance. This notification will include date, time and location of the pending disposal. This includes return of the VGCs, related equipment and/or software to the vendor.
B. The Director of the OGR&C may require an OGR&C representative or designee to be present at the disposal of VGCs, related equipment and/or software. In addition the OGR&C may require the disposal of the software to be video recorded.
C. Surveillance must be notified prior to disposal.
D. A disposal log will be maintained and available to the OGR&C upon request including:
    1. Date;
    2. Time;
    3. Location;

4. Method of disposal;
5. Identification and/or description of items being disposed of; and
6. Signatures of associate(s) attesting to the disposal.

VI. FORENSIC TESTING.

Section 1. Forensic testing is required in atypical circumstances in order to protect the integrity of the VGC and/or related equipment, company assets, and Guest/Player perceptions. Atypical circumstances include, but are not limited to:

A. An occurrence in which a VGC and/or related equipment displays information that is outside the realm of the capability of the software installed (i.e. huge jackpot display, symbols either not awarding win when they should or awarding win when they shouldn't, symbols changing erroneously, etc.).

B. An occurrence in which manipulation of the hardware of the VGC causes a change in the performance or outcome of the VGC (i.e. performs a function outside normal operation).

Section 2. The OGR&C or the Gaming Enterprise with GRA approval shall establish and implement procedures to protect the hardware, software and any other pertinent information relating to the forensic event or malfunction. Procedures shall contain, but not be limited to:

A. Notification to VGC Department Management, Security, Surveillance, and an OGR&C-Compliance employee on duty;

B. Handling of VGC, not resetting error conditions, not performing unnecessary game recalls, taking pictures of VGC screens prior to opening any doors, not closing any doors, with the VGC powered up, once they have been opened;

C. Gathering of information and evidence, review, photograph and record all information needed with the initial VGC access, not playing the VGC for testing purposes and not attempting to test any peripheral hardware components (e.g. bill acceptors) while attached to the VGC, running current online system events and meters for the last 30 days including the exceptional event or malfunction, Information about any anomalies observed on the VGC, guest and Associate statements regarding their observations of the occurrence; and

D. Securing the VGC, upon collection of available information, powering down the VGC and sealing with numbered tamper-evident tape across the door accesses.

Section 3. Upon review of all collected data, OGR&C Management in conjunction with Property Management will determine if the game vendor and the ITL will be notified. The GRA reserves the right to send any software/hardware to an ITL if deemed necessary.

A. All outside communications regarding the forensic event will be shared with the above management.

B. If any software/hardware will be removed from the VGC for further evaluation, the GRA shall notify the ITL of choice and complete the forensic submission.

VII. CASHLESS TICKETS.

The guest may request a cashless ticket from the VGC which reflects all remaining credits. The cashless ticket shall be printed at the VGC by an internal document printer.

VIII. JACKPOT STANDARDS.

Section 1. For payouts, documentation shall include the following information:
   A. Date and time;
   B. VGC number;
   C. Dollar amount of cash payout (both alpha and numeric) or description of personal property awarded, including fair market value;
   D. Game outcome (including reel symbols, card values, suits, etc.) for jackpot payouts; Preprinted or concurrently printed sequential number; and
   E. Signatures of at least two associates verifying and witnessing the payout.
      1. Jackpot payouts of $5,000 to $19,999.99 shall require the signature and verification of an associate independent of the VGC department in addition to the two signatures required.
      2. Jackpot payouts of $20,000.00 or more shall require the signature and verification of a member of management independent of the VGC department in addition to the two signatures required.

Section 2. Computerized validation systems shall be restricted so as to prevent unauthorized access and fraudulent payouts by one person, by the use of passwords, swipe cards, or other means as approved by the GRA.

Section 3. Payout forms shall be controlled and routed in a manner that precludes any one person from producing a fraudulent payout by forging signatures or by altering the amount paid out subsequent to the payout and misappropriating the funds.

Section 4. If the on-line electronic game management system generates a jackpot slip when a jackpot occurs on a cashless VGC, the jackpot receipt generated by the VGC shall be attached to either the cashier's copy of the jackpot slip or the copy that is given to the associate handling the payment of the jackpot.

IX. MANUAL PAYMENT STANDARDS.

Surveillance notification is required at initiation of all manual payments.

Section 1. Manual payments include, but are not limited to:
   A. Bill in No Credit/Ticket in No Credit;
   B. Short pays;
   C. Overrides;
   D. Damaged tickets;
   E. Manual jackpots; and
   F. Expired tickets.

Section 2. A VGC department supervisory associate must authorize manual payments with the exception of rounding to the next dollar. The individual that initiates the transaction cannot be the individual that authorizes the override. A physical verification by the supervisory associate must be performed to determine that the manual process is appropriate.

Section 3. Computerized validation systems shall be restricted so as to prevent unauthorized access and fraudulent payouts by one person, by the use of passwords, swipe cards, or other means as approved by the GRA.

Section 4. Payout forms shall be controlled and routed in a manner that precludes any one person from producing a fraudulent payout by forging signatures or by altering the amount paid out subsequent to the payout and misappropriating the funds.

Section 5. A manual or electronic log detailing the manual payment activity must be maintained and available to Accounting and the GRA. The log, at minimum, shall contain:
   A. Date;
   B. Time;
   C. Bank and stand number;
   D. VGC number;
   E. Associates involved;
   F. Transaction amount;
   G. Guest name; and
   H. Detailed reason.

X. PROGRESSIVE STANDARDS.
   Section 1. Access to progressive controller components.
   A. Progressive systems and components shall be adequately restricted to prevent unauthorized access (e.g., changing passwords at least quarterly, restricted dual access to EPROMs or other equivalent game software media, restrict physical access to computer hardware, etc.) as approved by the GRA.
   B. Access to the progressive controllers/systems shall be documented and accessible to the GRA. Documentation for the controller access shall include, but is not limited to, the following:
      1. Name of associate and identification number;
      2. Name of manufacturer personnel;
      3. Date/time of access;
      4. VGC number and location; and
      5. Reason for accessing the controller components.
   Section 2. Progressive Displays.
   A. A meter that shows the amount of the progressive jackpot shall be conspicuously displayed at or near the VGCs to which the jackpot applies.
   B. The meter shall show the current total of the progressive jackpot in credits or in monetary value (although minor discrepancies resulting from polling cycle delays are acceptable).
   C. Credits contributed to the progressive system during the polling cycle in which a jackpot signal is received by the progressive controller shall be deemed to have been contributed to the progressive amount before the jackpot; credits contributed to the progressive system in any subsequent polling cycle shall be deemed to have been contributed to the progressive amount after the jackpot.

D. Multiple items of information to be displayed on a VGC or progressive meter may be displayed in an alternating fashion provided there is a redundant progressive meter display.

Section 3. Probability of Winning. All VGCs connected to a linked progressive system shall:

A. Require the same maximum wager; or

B. If allowing different maximum wagers, the expected value of winning the top award must be equalized by setting the odds of winning the top award in proportion to the amount wagered. The method of equalizing the expected value of winning the top award shall be conspicuously displayed on each VGC connected to the system.

Section 4. Transfer of Funds. The Gaming Enterprise with GRA Board approval shall develop and implement procedures specific to the transfer of progressive amounts in excess of the base amount to other VGCs. Such procedures may also include other methods of distribution that accrue to the benefit of the gaming public via an award or prize. Procedures shall include the following requirements:

A. A Gaming Enterprise may permanently remove a progressive jackpot on a standalone progressive VGC, the linked progressive jackpot on an entire link of VGCs with a common progressive meter, or an entire wide area progressive system from a gaming floor provided notice of intent to remove the progressive jackpots in excess of $5,000 above base reset amount (aggregate for all progressive levels on the VGC) is:

   1. Conspicuously displayed on or near each VGC for at least seven (7) days prior to the removal of the progressive jackpot; and

   2. Notification is sent to GRAOGRCnotifications@grcasinos.com at least seven (7) days prior to the removal of the progressive jackpot.

   3. Progressive funds dispersed back to the same location with the same max wager are considered exempt from this procedure.

B. The progressive jackpot must be transferred to a standalone progressive VGC or progressive system with the same or greater probability of winning the progressive jackpot, the same or lower wager requirement to be eligible to win the progressive jackpot, and the same type of progressive jackpot. However, if no other VGC meets all of these qualifications, the Director of the OGR&C may authorize a transfer of the jackpot to the progressive meter of the most similar VGC available.

C. Except as otherwise authorized by this section, a progressive jackpot that is removed from the gaming floor shall be returned to the gaming floor or available to the gaming public within five gaming days.

   1. The amount on the progressive meter or meters on the returned or replacement VGC may not be less than the amount on the progressive meter or meters at the time of removal.

   2. This does not apply to the temporary removal by a gaming property for a period not to exceed thirty (30) days.

   3. This does not apply to linked VGCs that are part of a wide area progressive system provided that the progressive jackpot offered by the temporarily removed VGC remains available on VGCs that are part of the same wide area progressive system in another licensed facility.

D. An associate from both the VGC department and a department independent of the VGC department shall view the jackpot amount on the VGCs and determine the jackpot amount over the base jackpot. This information shall be documented and signed off by both departments. VGC department management shall determine where to place the funds and shall document this information. A supervisory associate from both the VGC department and the Finance department shall sign the documentation authorizing placement of the funds.

Section 5. Progressive Procedures.

A. The Gaming Enterprise shall develop and implement, with GRA approval, procedures for an in-house progressive system that:
1. Reconciles meters and jackpot payouts, including progressives escrow amounts;
2. Collect/drop VGC funds;
3. Verify jackpot;
4. System maintenance;
5. System accuracy;
6. System security; and
7. Verify payment and billing to Gaming Enterprises on pro-rata basis for Wide Area Progressives.

B. At least once each day, each Gaming Enterprise shall record the amount shown on each progressive jackpot meter at the Gaming Enterprise, except for those jackpots that can be paid directly by the VGC.

C. Explanations for meter reading decreases shall be maintained with the progressive meter readings, and where the payment of a jackpot is the explanation for a decrease, the Gaming Enterprise shall have a record of the jackpot payout number.

D. The Gaming Enterprise shall record the base amount of each progressive jackpot the Gaming Enterprise offers.

Section 6. System maintenance, accuracy, and security. It shall be the responsibility of the Vendor to ensure that all Mille Lacs Band regulations are met for system maintenance, accuracy and security for the Wide Area Progressives or Vendor maintained controllers installed on the gaming floor.

XI. VGC DEPARTMENT FUNDS STANDARDS.

The following standards shall apply with respect to VGC Department Funds:

Section 1. Change banks and pouches that are active during the shift shall be counted by at least two (2) associates, attested to by signature, recorded in ink or some other permanent form, at the beginning and end of each active shift. These associates shall make individual counts to compare for accuracy and maintenance of individual accountability. The operation must establish, as approved by the GRA Board, the threshold level at which a variance must be reviewed to determine the cause. Any such review must be documented. The results of any such investigation must be provided by email to GRAOGRCnotifications@grcasinos.com.

Section 2. Unverified transfers of cash and/or cash equivalents are prohibited.

Section 3. A record shall be maintained evidencing the transfers of currency and currency equivalents, and retained for seven (7) days.

XII. PROMOTIONAL PAYOUTS OR AWARDS.

If a Gaming Enterprise offers promotional payouts or awards that are not reflected on the VGC pay table, then the payout form/documentation shall include:

Section 1. Date and time;

Section 2. VGC number and denomination;

Section 3. Dollar amount of payout or description of personal property (e.g. jacket, toaster, car, etc.), including fair market value;

Section 4. Type of promotion (e.g., double jackpots, four-of-a-kind bonus, etc.); and

Section 5. Signature requirements for non-cash prizes shall follow the jackpot signature requirements. Dollar amounts/values used shall be fair market value.

XIII. VGC TOURNAMENTS.

Section 1. If a tournament system controller is used, access to the controller shall be password controlled and any key shall be dual controlled or the area where the controller is secured shall be dual access. Any controller shall be equipped with a tournament program, approved by an ITL, which allows for tournament mode play. Tournament systems must be capable of producing reports containing, but not limited to, the following information:

A. Tournament name;

B. Name of entrant (guest);

C. VGC position (bank/stand or other) played on;

D. Tournament points accrued during play; and

E. Prize(s) won for each entrant;

Section 2. Each VGC involved in the tournament shall be equipped with a tournament program, approved by an ITL, which allows for tournament mode play. The tournament option shall default to disabled. If tournament is an option, it shall be enabled by a GRA Board approved and controlled method requiring manual intervention and/or total replacement of the logic board with a tournament board which has been approved by an ITL. If the tournament is run on individual VGCs rather than through a tournament system controller, the same information required for a system report is required for each individual VGC.

Section 3. VGCs, while enabled for tournament play, shall not accept credits from any source, nor pay out credits in any way, but shall utilize tournament credits/points only. Tournament credits shall have no cash value and shall be used to determine the point standings of participants involved in the tournament. The tournament software shall not communicate any tournament-related accounting information to the system.

Section 4. All VGCs used in a single tournament shall utilize the same electronics and machine settings as all other VGCs involved in the tournament.

XIV. COMPUTER APPLICATIONS.

Any computer applications, alternate documentation and/or procedures that provide at least the level of control described by the standards found within this regulation as approved by the GRA shall be

acceptable. For all computerized VGC systems, a personnel access listing shall be maintained, which includes at a minimum:
   A. Associate/employee name or identification number (or equivalent); and
   B. Listing of functions associate/employee can perform or equivalent means of identifying same.

XV. SERVER-SUPPORTED.
Server-Supported Game (SSG) is a gaming system where the games are stored and the game outcome is determined within the client station/VGC. New games are downloaded, and/or changes to games available for play are initiated, from the system/server to the client station/VGC.
Section 1. Administrator Access. Administrator access to server supported gaming systems shall require the presence and participation of at least two people from separate departments. Dual access may be achieved using split passwords, dual keys or other suitable method. The Information Technology department shall specify in its internal controls, subject to GRA Board approval, the two departments that have administrator access to the server and the method by which access will be achieved.
Section 2. Any server-supported gaming systems shall follow all requirements in this and other applicable standards and regulations.
Section 3. Communications. All protocols must use communication techniques that have proper error detection and/or recovery mechanisms, which are designed to prevent tampering.
   A. Communication between the server-supported server and any other on-site computer system must be conducted over a secure hard-wired network.
   B. Communication between a server-supported gaming system and a VGC must be conducted over a secure hard-wired network.
   C. The server-supported gaming system shall perform the following minimum functions to control system operations:
      1. Validate the identity of those VGCs and devices to which it transmits and from which transmissions are received;
      2. Ensure that all data sent through a transmission is completely and accurately received; and
      3. Detect the presence of corrupt or lost data packets and, as necessary, reject the transmission.
Section 4. Physical Security**.** The server-supported gaming system's Central Server and main Interface Elements shall reside in a secure, dual access room:
   A. To which access is controlled and all ingress and egress is documented;
   B. Which is locked when not occupied by authorized personnel;
   C. That has surveillance coverage which permits identification of anyone accessing the room and server; and
   D. Which utilizes environmental controls such as uninterruptible power supplies, and fireproof and waterproof materials to protect critical hardware from natural disaster.
Section 5. Remote Access. Any remote access, defined as any access to the system outside the "trusted" network, shall follow the requirements in DGR 8, and, in addition, remote access to a

gaming device may only be conducted with the server or system portion of a server-supported gaming system.

A. A server-supported gaming system may only be accessed using a method that securely links the gaming system to the remote system requesting access. This secure link must uniquely identify the remote system requesting access as an entity authorized to conduct remote communications with the gaming system.

B. A server-supported gaming system must provide a hardware or software mechanism that will sever the connection between the gaming device and the remote access terminal. This device must default to and must remain in the disconnected state unless specifically set to allow communications as a result of a command issued by the gaming system. Additionally, upon completion of the communications, the device must again sever the connection between the gaming system and the remote access terminal.

C. A server-supported gaming system must log each remote access on the server or system part of the gaming system and on the secondary logging device. The log must include time and date of the access and a list of programs transferred or changed. OGR&C personnel shall have report/read only access to such logs.

D. A server-supported gaming system must not enable remote access unless the secondary logging device is operational and is communicating with the gaming system.

E. Software downloaded to a server-supported gaming system must be initially stored in a separate area or partition of memory such that the software is sufficiently segregated from the server supported gaming systems operating software as to be unable to affect the operation of the gaming system.

F. Software downloaded to a server-supported gaming system must be completely authenticated prior to performing any operation on the software including, but not limited to, decrypting, extracting or uncompressing.

Section 6. Verification. A server-supported gaming system must be capable of verifying that all control and game programs contained on the server or system portion are authentic copies of approved components of the gaming device both automatically, at least once every 24 hours, and on demand, using a third party verification process.

A. A program component of the verification mechanism must reside on and securely load from non-alterable program storage media.

B. The method of validation must provide at least 128 bits of resolution or be a bit by bit comparison and must prevent the execution of any control program component if the component is determined to be invalid.

C. If an error is detected, the Server-Supported Game System must provide a visual notification of the invalid program.

D. A report shall be available which details the outcome of each automated execution of the validation mechanism and shall identify any invalid program components.

E. In the event of a failed authentication, the system shall deactivate the failed component such that the following functions, including, but not limited to download, install and configuration to a terminal/VGC, are not possible.

F. The verification process shall not include any process or security software provided by the operating system or system manufacturer.

G. OGR&C personnel shall confirm each verification and have read only access to any reports generated.

Section 7. <u>Download Data Library.</u> The download data library refers to the formal storage of all approved data files that may be downloaded to VGCs. The Server-Supported Game System must contain a download data library for the formal storage of all approved data files, including, but not limited to, control and game software, peripheral firmware, and configuration data.

A. Any changes made to the Download Data Library including, but not limited to, the addition, deletion, or changing of game programs, must be stored in an unalterable audit log, which shall include:

    1. Time and date of the access and/or event;

    2. Log in name of person making the change; and

    3. Download data files added, deleted, or changed.

B. A record of activity between the server and VGCs that involves the downloading of program logic, the adjustment of VGC settings/configurations, or the activation of previously downloaded program logic, must be stored in an unalterable audit log. OGR&C personnel shall have report/read only access to such audit logs. Logs shall include, but not be limited to, the following:

    1. The terminal/VGC the program was loaded to and, if applicable, the program it replaced;

    2. The terminal/VGC the game program was activated on and, if applicable, the program it replaced; and

    3. Changes to the configuration/settings and what the changes were.

Section 8. <u>System Failure.</u> A system backup and recovery plan must be in place per DGR 8 requirements. The system shall be designed to protect the integrity of data in case of a failure. Audit logs, system databases and other pertinent data must be stored using reasonable protection methods. The method used must also provide open support for backups and restoration. Data backup must occur at least once every 24 hours.

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Prior versions of this Detailed Gaming Regulation are available upon request from the Gaming Regulatory Authority.