



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

**PROMOTIONAL GAMING DEVICES AND
PROMOTIONAL SYSTEMS**

Document No. DGR – 11a

Effective: September 26, 2006

I. SCOPE. This section includes the Detailed Gaming Regulations for Promotional Gaming Devices and Promotional Systems, to be regulated and played in compliance with Title 15 of the Mille Lacs Band Statutes Annotated, 25 C.F.R. § 542.13 and the Fifth Amendment to Technical Standards in Tribal-State Compact for Control of Class III Video Games of Chance on the Mille Lacs Band of Chippewa Reservation in Minnesota.

II. FORMAL SUBMISSION. Prior to implementation of a promotion, formal submission to and written approval must be received from the Gaming Regulatory Authority, who may unconditionally approve, require additional constraints be placed on the promotion to resolve any issues, or disallow the promotion.

Section 1. Promotions that are used or that are offered on a recurring basis having the same promotion structure as a previously approved promotion by the Gaming Regulatory Authority do not require resubmission to the GRA prior to use.

III. DEFINITIONS.

Section 1. “Promotional Systems” are comprised of gaming devices that are configured to participate in electronically communicated promotional award payments from a host system and the host system controls the promotional award issuance parameters.

Section 2. “Promotional Awards” are based on predefined patron activity criteria that are tied to a specific patron/account, which generally recur.

Section 3. “Restricted Credits” are credits received from a promotional award that cannot be redeemed for cash; but will remain in the players account until used or expired

Section 4. “Unrestricted Credits” are credits received from a promotional award or earned during the play of credits from a promotional award that may be redeemed for cash.

IV. GAMING DEVICE(S) WITH A PROMOTIONAL FEATURE REQUIREMENTS.

Section 1. Configuring Promotion Transactions on a Gaming Device. Since a Promotional feature would impact the electronic accounting meters, any gaming device that allows Promotional gaming as a selectable feature must be a “secure means”.

Section 2. Error Conditions. The following conditions must be monitored, and messages must be displayed to the patron, which would indicate the reason for any transaction failure to include the following:

- A. Invalid PIN or Player ID (Can prompt for re-entry up to maximum allowed);
- B. Account Unknown

Section 3. Identifying a Promotional Device: A patron shall be able to identify each machine that supports the promotion by means left to the discretion of the Band (e.g. remove display menu items that pertain to promotional operation for gaming machines not participating; provide a host message indicating promotional capability; or a specific sticker on gaming machines to indicate either participation or non-participation.) The method of identification will comply with requirements set forth in DGR 11.

Section 4. Methods of Promotional Award Notification: The method of promotional award notification can include any combination of host messaging, sounds, or visual indicators as long as deemed acceptable by the Band. Since promotional awards are paid directly to the gaming



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device (if applicable after player intervention), the gaming device itself shall reflect the amount of promotional awards. Additionally, electronic accounting meters, and logs will reflect all promotional transactions in accordance with technical standards conveyed in DGR 11.

Section 5. Disclaimers and Feature Expiration: Any disclaimers such as promotion expiration and their display to the public are also left to the discretion of the Band, as they will likely be non-uniform across specific manufacturer implementations. Qualifying parameters and / or frequency of events and any specific information relevant to the award type (e.g. the card reader bezel lighting a specific color to indicate a patron had qualified for a promotional award.)

V. CENTRAL SYSTEM SECURITY REQUIREMENTS. The rules within this section shall be implemented by the host system to allow for securely changing of any of the associated parameters. Additionally, the communication process must be robust and stable enough to secure each promotional transaction such that failure event(s) can be identified and logged for subsequent audit and reconciliation.

Section 1. Modification of Critical Parameters. All changes to parameters that may impact promotion redemption frequency or amount must be logged indicating:

- A. Who made the change;
- B. The altered parameter;
- C. The time and date of change;
- D. The parameter value before and after the change; and
- E. The reason for the parameter adjustment.

Section 2. Prevention of Unauthorized Transactions. The following minimum controls shall be implemented by the host system to ensure that games are prevented from responding to commands for crediting outside of properly authorized Promotional transactions (hacking):

- A. The network hubs are secured (either in a locked / monitored room or area) and no access is allowed on any node without valid login and password;
- B. The number of stations where critical promotional application or associated databases could be accessed is limited;
- C. The users who have the requisite permission levels / login to adjust critical parameters are limited;
- D. Procedures be in place on the system to identify and flag suspect player and employee accounts to prevent their unauthorized use to include:
 - 1. Having maximum number of incorrect PIN entries before account is locked out;
 - 2. Flagging of “hot” accounts where cards (other instruments) have been stolen;
 - 3. Invalidating accounts and transferring all balances into a new account;
 - 4. User roles or procedures are established in promotional parameter configuration applications, which enforce logical separation of controls to discourage obvious misbehavior.

Section 3. Background Checks. All system personnel having control over, or who provide maintenance to the promotional system shall be subject to the background investigation / fingerprint process as conveyed in DGR-7.

Section 4. Diagnostic Tests on a Promotional Gaming Device. Controls are placed on any diagnostic functionality available at the device / system such that all activity would reflect a



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specific account(s) and the individual(s) tasked to perform these diagnostics whereby all promotional diagnostic activity that effect the gaming machine associated meters may be audited by the Gaming Regulatory Authority.

Section 5. Loss of Communication. If communication between the accounting system and the gaming device is lost, the game or interface element must display a message to the player that promotional transfers cannot currently be processed.

VI. CENTRAL SYSTEM AUDIT TRAILS.

Section 1. Promotional Transaction Logs. The central system shall have the ability to produce logs for all complete promotional transactions to include the same information required on gaming machine audit logs and capable of being filtered by:

- A. Machine number;
- B. Patron account; or
- C. Promotional identification.

Section 2. Transaction Report. The player must be provided the ability to review a complete and comprehensive transaction report of all Promotional transactions concluded, indicating each separate transaction with amount.

- A. Note: The audit trail could be accessed on the gaming device via the card reader (or equivalent) or such information could be requested of the floor personnel who would process such requests via a query of the Promotional system.

Section 3. Investigations. For the purpose of facilitating investigation of criminal conduct, the following reports will be available to appropriate law enforcement agencies for review:

- A. Xtra Credit History;
- B. Xtra Credit History by Date Detail;
- C. Bonus Transaction;
- D. Bonus Activity by Player Summary;
- E. Bonus Activity by Player Detail;
- F. Bonus Activity by Machine Summary;
- G. Bonus Activity by Machine Detail;
- H. Meter Verification Detail;
- I. Bonus Adjustment;
- J. Bonus Adjustment by Adjustor;
- K. Bonus Adjustment Detail.
- L. If other promotional system reports are judged as being of potential benefit in the criminal investigation process, they will also be made available for review.

Section 4. Financial Reports. The system shall have the ability to produce the following reports:

- A. Patron Promotion Account Summary and Detail Reports. These reports shall at a minimum include:
 - 1. Beginning and ending balance(s), and
 - 2. Transaction information including gaming machine number, amount, date / time and type (if multiple types are supported.);
- B. Liability Report. The Liability Report shall at a minimum include:
 - 1. The previous days starting value of outstanding promotional liability,



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2. Aggregate promotional in and out totals, expired promotional value, and
 3. Ending promotional liability.
- C. Promotional Meter Reconciliation Summary and Detail Reports. These reports shall provide reconciliation of each participating gaming machine promotional meter(s) against the host system's promotional activity.

VII. PLAYER ACCOUNT.

Section 1. Personal Identification Number. For awards tied to a specific patrons account, the casino will issue the patron a unique magnetic card and Personal Identification Number (PIN) in conjunction with an account on the system's database.

Section 2. Player Account Transactions. All transactions between a supporting gaming machine and the host system will be secured by card insertion into a magnetic card reader attached to the host system or other protected means.

Section 3. Promotional Options Presentation. The promotional options are presented to the patron on the LCD/VFD display of the card reader, which will require selection using a keypad/touch screen before occurring.

Section 4. Account Balance. Current balance information and promotional award transaction activities will be available on demand at any participating gaming device or other system terminal after confirmation of patron identity. All discretionary account funds (i.e. those funds that have a possible expiration) must be maintained separately.

Section 5. Removing Promotional Credits from a Players Account. Promotional credits may be removed from a player's account either through:

- A. Downloading of the promotional credits to the gaming device;
- B. Redeeming the promotional credits for merchandise / cash via a cashier; or
- C. Expiration of promotional credits.

Section 6. Movement of Promotional Credits. Players may have the option of moving some of the system promotional credit to the gaming device they are playing through "withdrawal" from the players account, maintained by the system. Then when they are finished playing, they may either "deposit" their balance from the machine onto their player account or redeem them from the gaming device via the available payout mechanism. Promotional gaming transactions are entirely electronic.

Section 7. Movement of Restricted Credits. Players may utilize restricted credits received from a promotional award for play at any gaming device which accepts promotional awards. Players may not redeem restricted credits for cash; however the restricted credits will remain within the players account for use at another gaming device.

Section 8. Movement of Unrestricted Credits. Players may utilize unrestricted credits for play at any gaming device which accepts promotional awards, deposit them back into their players club account or redeem them from the gaming device via the available payout mechanism.

Section 9. Restricted Credits Wagered First. If restricted promotional credits and non-restricted promotional credits are commingled on one credit meter at the gaming device: when restricted promotional credits are transferred to a game and a game already has existing cashable credits available; the game must pull from the restricted credit balance first during player wagering. All restricted credits must be wagered first before any non-restricted credits are committed.



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History. Approved by Band Assembly on September 26, 2006.

Changes to formatting where applicable.; Changes to IV section 3: (Section 6.9 (13)) changed to DGR 11.; Changes to IV section 4: (Section 6.10 (5) of the Tribal-State Compact for Control of Class III Video Games of Chance on the Mille Lacs Band of Chippewa Reservation in Minnesota.) changed to DGR 11.; Changes to VI section 4(A): (These reports shall include) changed to (These reports shall at a minimum include); Changes to VI section 4(B): (The Liability Report shall include) changed to (The Liability Report shall at a minimum include) approved by the Gaming Regulatory Authority on April 8, 2011. **Effective date of changes April 8, 2011.**