



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

BINGO AND PULL TABS

Document No. DGR – 12

Effective: December 17, 2013

I. BINGO.

Section 1. SCOPE. The following includes the Detailed Gaming Regulations for Bingo to be regulated and played in compliance with Title 15 of the Mille Lacs Band Statutes Annotated.

Section 2. GAME REGULATIONS APPLICABLE TO BINGO. A Gaming Enterprise shall comply with all requirements set forth in the applicable Federal Regulations and Mille Lacs Band Detailed Gaming Regulations.

- A. The Gaming Enterprise shall implement a System of Internal Control Standards (SICS), as approved by the Gaming Regulatory Authority (GRA) Board.
- B. Subsequent revisions to the SICS must be provided to the GRA 30 days prior to implementation.
- C. The GRA reserves the right to require changes to any internal control or procedure to ensure compliance with applicable laws and regulations.

Section 3. SUPERVISION. Supervision must be provided as needed for bingo operations by associates with authority equal to or greater than those being supervised.

Section 4. COMPUTER APPLICATIONS. For any computer applications utilized, alternate documentation and procedures that provide at least the level of control described by the standards in this regulation will be acceptable. Any such documentation and procedures must be provided to the GRA Board upon request.

Section 5. BINGO PAPER CONTROL. The bingo paper physical controls must address the placement of orders, receipt, storage, issuance, removal and cancellation of bingo card inventory that bingo cards have not been marked, altered, or otherwise manipulated.

- A. When received, bingo paper must be inventoried and secured by an authorized associate(s) independent of bingo sales.
- B. When bingo card inventory is initially received from the supplier, it must be inspected (without breaking the factory seals, if any), counted, inventoried and secured by an authorized associate.
- C. Bingo card inventory records must include the date received, quantities received and the name of the individual conducting the inspection.
- D. The issue and return of bingo paper must be documented and signed for by the authorized associate(s) responsible for inventory control and a recipient.
 1. The bingo control log must include the series number of the bingo paper;
 2. Issuance of inventory from storage to a staging area;
 3. Issuance of inventory from a staging area to the cage or sellers;
 4. Return of inventory from a staging area to storage; and
 5. Return of inventory from a cage or seller to a staging area or storage.
- E. Bingo card inventory must be accounted for at all times and logs must include:
 1. Date;
 2. Shift or session;
 3. Time;



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4. Location;
 5. Inventory received, issued, removed and returned;
 6. Signature of associate performing transaction;
 7. Signature of associate performing reconciliation;
 8. Any variance;
 9. Beginning and ending inventory; and
 10. Description of inventory transaction being performed.
- F. Once each month, an authorized associate(s) independent of both bingo paper sales and bingo paper inventory control must verify the accuracy of the ending balance in the bingo control log by reconciling it with the bingo paper inventory.
- G. Bingo cards must be maintained in a secure dual controlled location, accessible only to authorized associates, and with surveillance coverage adequate to identify associates accessing the storage area.
- H. Bingo cards removed from inventory that are deemed out of sequence, flawed, or misprinted and not returned to the supplier must be cancelled to ensure that they are not utilized in the play of a bingo game. Bingo cards that are removed from inventory and returned to the supplier or cancelled must be logged as removed from inventory.
- I. Bingo cards associated with an investigation must be retained intact outside of the established removal and cancellation policy.

Section 6. BINGO SALES.

- A. The Gaming Enterprise must accurately account for all bingo sales.
- B. All bingo sales records must include the following information:
1. Date;
 2. Time;
 3. Shift or session;
 4. Sales transaction identifiers, which may be the unique card identifier(s) sold or when electronic bingo card faces are sold, the unique identifiers of the card faces sold;
 5. Quantity of bingo cards sold;
 6. Dollar amount of bingo sales;
 7. Signature, initials or identification of the associate or device who conducted the bingo sales; and
 8. When bingo sales are recorded manually, total sales are verified by an authorized associate independent of the bingo sales being verified and the signature, initials or identification of the authorized associate who verified the bingo sales is recorded.
- C. No associate shall have unrestricted access to modify bingo sales records.
- D. An authorized associate independent of the seller must perform the following standards for each seller at the end of each session:
1. Reconcile the documented total dollar amount of cards sold to the documented quantity of cards sold;
 2. Note any variances; and
 3. Appropriately investigate any noted variances with the results of the follow-up documented.



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- E. All gaming must be conducted on a cash basis. This restriction does not restrict the right of the Gaming Enterprise or any other person to offer check cashing, or to install or accept bank cards or debit cards for transactions in the same manner as would be normally permitted at any retail business.
 - F. Bingo sale voids must be processed in accordance with the rules of the game and established controls that must include patron refunds.
 - 1. When a bingo card must be voided, the following controls must apply (as relevant):
 - i. A non-electronic bingo card must be marked void;
 - ii. The authorization of the void, by an authorized supervisor of the original sale transaction must be recorded either by signature on the bingo card or by electronically associating the void authorization to the sale transaction of the voided bingo card;
 - iii. Cards may not be voided after the start of a game for which the card was sold; and
 - iv. Documentation of the reason for the void.
 - 2. When previously sold bingo cards need to be reissued, the following controls must apply:
 - i. The original sale of the bingo cards must be verified; and
 - ii. The reissue of the bingo cards must be documented, including the identity of the associate authorizing reissuance.

Section 7. DRAW, VERIFICATION AND DISPLAY. The Gaming Enterprise shall establish and comply with procedures to ensure the identity of each object drawn is accurately recorded and transmitted to the participants. The procedures must provide a method of recall of the draw which includes the order and identity of each object drawn.

- A. For all games offering a prize payout of \$1,200.00 or more, as the objects are drawn, the identity of the objects must be immediately recorded and maintained for at least 24 hours.
- B. Controls must be present to ensure that all objects used in the conduct of the bingo game are available to be drawn and have not been damaged or altered. Verification of physical objects must be performed by two (2) associates before the start of the first bingo game/session. At least one of the verifying associates must be a supervisory associate or independent of the Bingo Department.
- C. Each ball must be shown to a camera immediately before it is called so that it is individually displayed to all patrons.
- D. For bingo games not verified by camera equipment, each ball drawn must be verified by an associate independent of the bingo caller responsible for calling the bingo game.

Section 8. SEGREGATION OF DUTIES.

- A. The functions of sales and prize payout verification must be segregated, if performed manually. Associates who sell bingo cards on the floor must not verify bingo cards for prize payouts with bingo cards in their possession of the same type as the bingo card being verified for the game.
- B. Floor clerks who sell bingo cards on the floor are permitted to announce the identifiers of winning bingo cards.
- C. The caller's desk must not have the ability to sell or modify sales information.



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Section 9. WINNING CARD VALIDATION. The Gaming Enterprise shall establish and comply with procedures to determine the validity of the claim prior to the payment of a prize (i.e., bingo card was sold for the game played, not voided, etc.) by at least two (2) associates.

Section 10. PAYOUT VERIFICATION. The Gaming Enterprise shall establish and comply with procedures to ensure that at least two (2) associates verify the winning pattern has been achieved on the winning card prior to the payment of a prize.

- A. Prize payouts of \$1,199.99 or less require the authorization and signature of at least two (2) associates.
- B. Prize payouts of \$1,200.00 to \$4,999.99, require the signature and verification of two (2) associates, one of whom must be a management associate.
- C. Prize payouts \$5,000.00 or greater require the signature and verification of three (3) associates, one whom must be a management associate independent of the Bingo Department.
- D. Payout records must include the following information:
 1. Date and time;
 2. Amount of the payout;
 3. Bingo card identifier;
 4. Game name or number;
 5. Description of pattern covered(such as cover-all or four corners);
 6. Signature of all associates involved in the transaction; and
 7. Any other information necessary to substantiate the payout.

Section 11. OPERATIONAL CONTROL PROCEDURES. The Gaming Enterprise shall establish and comply with procedures to prevent unauthorized access to or fraudulent transactions involving cash or cash equivalents.

- A. Cash or cash equivalents exchanged between two associates must be counted independently by at least two (2) associates and reconciled to the recorded amounts at the end of each session. Unexplained variances must be documented and maintained. Unverified transfers of cash or cash equivalents are prohibited.
- B. Cash or cash equivalent controls must include counting and recording the following on a session accountability form:
 1. Inventory, including any increases or decreases;
 2. Transfers;
 3. Exchanges, including acknowledging signatures or initials; and
 4. Resulting variances.
- C. Any change of control of accountability, exchange or transfer must require the cash or cash equivalents be counted and recorded independently by at least two (2) associates and reconciled to the recorded amount.

Section 12. GAMING EQUIPMENT.



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- A. The Gaming Enterprise shall establish and comply with procedures that restrict access to associates for the controlled gaming equipment/components (e.g. draw objects and back-up draw objects).
 - B. The game software components of a Class II gaming system will be identified in the test laboratory report. When initially received, the software must be verified to be authentic copies, as certified by the independent testing laboratory.
 - C. The GRA shall establish and comply with procedures relating to the periodic inspection, maintenance, testing and documentation of a random sampling of gaming equipment/components, including but not limited to:
 1. Software related to game outcome must be authenticated semi-annually by a GRA employee by comparing signatures against the test laboratory letter on file with the GRA for that version.
 2. The manufacturer must provide specialized equipment or the services of an independent technical expert to assist with the testing, examination and analysis.

Section 13. PROGRESSIVE PRIZE POOLS.

- A. A display that shows the amount of the progressive prize must be conspicuously displayed at or near the player interface(s) to which the prize applies.
- B. At the end of each session, each Gaming Enterprise shall record the total amount of each progressive prize pool offered at the Gaming Enterprise on the progressive log.
- C. When a manual payment for a progressive prize is made from a progressive prize pool, the amount must be recorded on the progressive log.
- D. Each Gaming Enterprise shall record, on the progressive log, the base reset amount of each progressive prize the Gaming Enterprise offers.
- E. The Gaming Enterprise shall establish and comply with procedures specific to the transfer of progressive amounts in excess of the base reset amount to other awards or prizes. Such procedures may also include other methods of distribution that accrue to the benefit of the gaming public.

Section 14. DISPOSAL OR DESTRUCTION OF BINGO EQUIPMENT.

- A. Any Gaming Enterprise seeking to destroy or dispose of Bingo Equipment shall obtain the written approval of the GRA Board or its designee prior destruction or disposal.
- B. The GRA Board shall approve the destruction or disposal of Bingo Equipment to protect the integrity of gaming at a Gaming Enterprise or, as otherwise required by law.
- C. The Gaming Enterprise shall provide a written notice at least 14 days in advance to the Director of the OGR&C at GRAOGRNotifications@grcasinos.com. The Director shall present the notice to the GRA Board for approval.
- D. The notice must include the following:
 1. A brief explanation for the proposed destruction or disposal.
 2. Identification of the equipment including:
 - i. Type and amount of equipment to be destroyed, name of the manufacturer and model number (if applicable);
 - ii. Unique identification number (if applicable); and



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- iii. Date and source of original acquisition.
- 3. Description of method of destruction or disposal including:
 - i. Name of the associate responsible for destruction or disposal;
 - ii. Date, place and time of proposed destruction or disposal; and
 - iii. Proposed method for destruction or disposal.
- E. The GRA Board may require an OGR&C employee or designee to be present at the destruction or disposal of the Bingo Equipment. The Board may require the destruction of the Bingo Equipment to be video recorded.
- F. Once destruction or disposal is complete, written verification must be provided to the GRA Board.
- G. All documentation of destroyed and disposed Bingo Equipment must be maintained for at least two (2) years by the Gaming Enterprise.

II. PULL TABS.

Section 1. SCOPE. This section includes the Detailed Gaming Regulations for Pull Tabs to be regulated and played in compliance with Title 15 of the Mille Lacs Band Statutes Annotated.

Section 2. GAME REGULATIONS APPLICABLE TO PULL TABS. A Gaming Enterprise shall comply with all requirements set forth in the applicable Federal Regulations and Mille Lacs Band Detailed Gaming Regulations.

- A. The Gaming Enterprise shall implement a System of Internal Control Standards (SICS), as approved by the Gaming Regulatory Authority (GRA) Board.
- B. Subsequent revisions to the SICS must be provided to the GRA 30 days prior to implementation.
- C. The GRA reserves the right to require changes to any internal control or procedure to ensure compliance with applicable laws and regulations.

Section 3. SUPERVISION. Supervision must be provided at all times Pull Tabs is in operation by associates with authority equal to or greater than those being supervised.

Section 4. COMPUTER APPLICATIONS. For any computer applications utilized, alternate documentation and procedures that provide at least the level of control described by the standards in this regulation will be acceptable. Any such documentation and procedures must be provided to the GRA upon request.

Section 5. OCCUPATIONAL TAX. The Gaming Enterprise shall comply with IRS regulations and pay the occupational tax as imposed on those associates who receive wagers that are subject to tax. Such occupational tax must be paid prior to an associate accepting any wagers, and then annually thereafter.

Section 6. PULL TAB INVENTORY.

- A. The pull tab inventory (including unused tickets) must be controlled to ensure the integrity of the pull tabs.



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- B. Purchased pull tabs must be inventoried and secured by an associate independent of the pull tab sales.
- C. The issue of pull tabs to the cashier or sales location must be documented and signed for by the associate responsible for inventory control and the cashier. The document log must include the serial number of the pull tabs issued.
- D. Appropriate documentation must be given to the redemption booth for purposes of determining if the winner purchased the pull tab from the pull tabs issued by the Gaming Enterprise. Electronic verification satisfies this requirement.
- E. Pull tabs must be maintained in a secure location, accessible only to authorized associates, and with surveillance coverage adequate to identify associates accessing the area.
- F. Exchanges of pull tabs between associates must be secured and independently controlled.

Section 7. PULL TAB SALES.

- A. Controls must be established and procedures implemented to record, track and reconcile all pull tab sales and voids.
- B. When pull tab sales are recorded manually, total sales must be verified by an associate(s) independent of the pull tab sales being verified.
- C. No associate may have unrestricted access to pull tab sales records.

Section 8. WINNING PULL TABS. Winning pull tabs must be verified and paid as follows:

- A. Prize payouts of \$600.00 or more, or a lesser amount established by the Gaming Enterprise and approved by the GRA, must be verified and documented by at least two (2) associates, one of whom must be a Key associate independent of the Pull Tabs Department.
- B. Prize payouts of more than \$1,199.99 must be verified and documented by at least two (2) associates, one of whom must be a supervisory or management associate from a department independent of the Pull Tabs Department.
- C. Total payout must be computed and recorded by shift.
- D. The winning pull tabs must be voided so that they cannot be presented for payment again.
- E. Controls must be established and procedures implemented to record, track, and reconcile all redeemed pull tabs and pull tab payouts.

Section 9. ACCOUNTABILITY FORMS. All funds used to operate the pull tab game must be recorded on an accountability form. All funds used to operate the pull tab game must be counted independently by at least two (2) associates and reconciled to the recorded amounts at the end of each shift or session, and all transfers of cash or cash equivalents must be verified.

Section 10. NO CREDIT EXTENDED. All gaming must be conducted on a cash basis. This restriction does not restrict the right of the Gaming Enterprise or any other person to offer check cashing, or to install or accept bank cards or debit cards for transactions in the same manner as would be normally permitted at any retail business.

Section 11. DISPOSAL OR DESTRUCTION OF PULL TABS.



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- A. The GRA Board shall approve the destruction or disposal of pull tabs to protect the integrity of gaming at a Gaming Enterprise, or as otherwise required by law.
 - B. The Gaming Enterprise shall submit written procedures for the destruction and disposal of pull tabs to the GRA Board for approval.
 - C. The procedures for destruction of pull tabs must include the following:
 1. A brief explanation of the method of destruction;
 2. Name of associate or entity responsible for the destruction; and
 3. Timelines for destruction for both winning and losing pull tabs.
 - D. The procedures for disposal must include:
 1. Written notification to the Director of OGR&C prior to the disposal of pull tabs;
 2. Name of the Gaming Enterprise where the pull tabs are being disposed from;
 3. Type, amount and name of the manufacturer of the pull tabs;
 4. Unique identification number; and
 5. Date and source of original acquisition.
 - E. The GRA Board may require an OGR&C employee to be present at the destruction or disposal of pull tabs. The GRA Board may require the destruction of the pull tabs to be video recorded.
 - F. All documentation of destroyed and disposed pull tabs must be maintained for at least two (2) years by the Gaming Enterprise.

History.

Changes to grammar and formatting where applicable. Change “shall” to “must” where applicable. Replace “employee” with “associate” where applicable. Remove “/or” from “and/or” where applicable. Change “gaming operation” to “Gaming Enterprise” where applicable. Part I Section 1: remove “MLBSA”; replace with “Title 15 of the Mille Lacs Band Statutes Annotated” after *compliance with*. Add Part II Section 2: GAME REGULATIONS APPLICABLE TO BINGO. A Gaming Enterprise shall comply with all requirements set forth in the applicable Federal Regulations and Mille Lacs Band Detailed Gaming Regulations. The Gaming Enterprise shall implement a System of Internal Control Standards (SICS), as approved by the Gaming Regulatory Authority (GRA) Board. Subsequent revisions to the SICS must be provided to the GRA 30 days prior to implementation of revision. The GRA reserves the right to require changes to any internal control or procedure to ensure compliance to applicable laws and regulations. Add Part II Section 3: SUPERVISION. Supervision shall be provided as needed for bingo operations by associates with authority equal to or greater than those being supervised. Part II Section 4: change “section” to “regulation” after *this*. Part II Section 5: Change “Inventory of Bingo Paper” to “**BINGO PAPER CONTROL**” Part II Section 5: change “inventory” to “physical controls” after *paper*; replace “inventory must be controlled so as to assure the integrity of the bingo paper being used as follows:” with “physical controls must address the placement of orders, receipt, storage, issuance, removal and cancellation of bingo card inventory that bingo cards have not been marked, altered, or otherwise manipulated.” Part II Section 5: add (B) When bingo card inventory is initially received from the supplier, it must be inspected (without breaking the factory seals, if any), counted, inventoried, and secured by an authorized associate. Part II Section 5: add (C) Bingo card inventory records must include the date received, quantities received, and the name of the individual conducting the inspection. Part II Section 5(D): add “and return” after *issue*; delete “to the cashiers” after *paper*; replace “cashier” with “recipient” after *and a*. Part II Section 5: delete original (C): “The bingo control log must be utilized by the Gaming Enterprise to verify the integrity of the bingo paper being used; and” Part II Section 5(D): add The bingo control log must include the series number of the bingo paper; Issuance of inventory from storage to a staging area; Issuance of inventory from a staging area to the cage or sellers; Return of inventory from a staging area to storage; and Return of inventory from a cage or seller to a staging area or storage. Part II Section 5: add (E) Bingo card inventory must be accounted for at all times and logs must include: Date; Shift or session; Time; Location; Inventory received, issued, removed and returned; Signature of associate performing transaction; Signature of associate performing reconciliation; Any variance; Beginning and ending inventory; and Description



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of inventory transaction being performed. Part II Section 5: add (G) Bingo cards must be maintained in a secure dual controlled location, accessible only to authorized associates, and with surveillance coverage adequate to identify associates accessing the storage area. Part II Section 5: add (H) Bingo cards removed from inventory that are deemed out of sequence, flawed, or misprinted and not returned to the supplier must be cancelled to ensure that they are not utilized in the play of a bingo game. Bingo cards that are removed from inventory and returned to the supplier or cancelled must be logged as removed from inventory. Part II Section 5: add (I) Bingo cards associated with an investigation must be retained intact outside of the established removal and cancellation policy. Part II Section 6: add (A) The Gaming Enterprise must accurately account for all bingo sales. Part II Section 6(E): replace “shall” with “does” after *restriction* Part II Section 5. Voiding Bingo Sales (original): replaced “Procedures must be established and implemented to prevent the voiding of card sales after the start of the calling of the game for which the bingo card was sold. Cards may not be voided after the start of a game for which the card was sold.” with Part II Section 6(F): “Bingo sale voids must be processed in accordance with the rules of the game and established controls that must include patron refunds.” Part II Section 6(F)(1)(iii): replaced “Reissue of Previously Sold Bingo Cards. When one or more” with “Cards may not be voided after the start of a game for which the card was sold; and” Part II Section 6(F): add (iv) “Documentation of the reason for the void.” Part II Section 6(F)(2): add “When” before *previously* Part II Section 7: replaced “implement” with “comply with” after *establish and*; replace “identify the method used to ensure” with “provide a method of recall of the draw which includes the order and” after *must* Part II Section 7(A): replaced “a minimum of” with “at least” after *for* Part II Section 7(B): replaced “eligible for the draw” with “used in the conduct of the bingo game” after *objects*; replaced “prior to the next draw” with “and have not been damaged or altered. Verification of physical objects must be performed by two associates before the start of the first bingo game/session. At least one of the verifying associates must be a supervisory associate or independent of the Bingo Department.” after *drawn* Part II Section 8(C): replaced “Caller’s Desk shall” with “caller’s desk must” after *The* Part II Section 9: added “WINNING CARD VALIDATION. The Gaming Enterprise shall establish and comply with procedures” Part II Section 10: added “PAYOUT VERIFICATION. The Gaming Enterprise shall establish and comply with procedures”; removed “Procedures must be established and implemented” Part II Section 10(A): removed “shall” before *require* Part II Section 10(B): removed “shall” before *require*; replaced “of who” with “whom” before *must*; replaced “employee authorizing and witnessing the prize payout” with “associate” after *management* Part II Section 10(C): removed “shall” before *require*; replaced “of who” with “whom” before *must*; Part II Section 10: add (D) Payout records must include the following information: Date and time; Amount of the payout; Bingo card identifier; Game name or number; Description of pattern covered, such as cover-all or four corners; Signature of all associates involved in the transaction; and Any other information necessary to substantiate the payout. Part II Section 11: replaced “Operational Controls Procedures must be established and implemented with the intent” with “OPERATIONAL CONTROL PROCEDURES. The Gaming Enterprise shall establish and comply with procedures” before *to prevent* Part II Section 12(A): replaced “implement” with “comply with” before *procedures* Part II Section 12(C): replaced “implement” with “comply with” before *procedures* Part II Section 12(C)(1): replaced “an employee independent of bingo operations” with “a GRA employee” before *by*; replaced tribal gaming regulatory authority” with “GRA” before *the* Part II Section 12 (original): removed “Player Tracking System.” Section Part II Section 14(A): replaced “which wishes” with “seeking” after *Enterprise*; deleted “otherwise” before *dispose*; deleted “otherwise” before *disposing* Part II Section 14(B): replaced “when it finds that doing so protects” with “to protect” before *the* Part II Section 4(C): replaced “Executive Director of the Office of Gaming Regulation and Compliance” with “Director of the OGR&C at GRAOGRNotifications@grcasinos.com”; deleted “Executive” before *Director*; deleted “its” before *approval* Part II Section 14(D)(1): removed “written” before *explanation* Part II Section 14(D)(3)(i): replaced “employee” with “associate” Part II Section 14(E): replaced “representative” with “employee” after *OGR&C* Part II Section 14(F): replaced “should” with “must” after *verification* Part III Section 1: remove “MLBSA”; replace with “Title 15 of the Mille Lacs Band Statutes Annotated” after *compliance with* Part III: add Section 2 GAME REGULATIONS APPLICABLE TO PULL TABS. A Gaming Enterprise shall comply with all requirements set forth in the applicable Federal Regulations and Mille Lacs Band Detailed Gaming Regulations. The Gaming Enterprise shall implement a System of Internal Control Standards (SICS), as approved by the Gaming Regulatory Authority (GRA) Board. Subsequent revisions to the SICS must be provided to the GRA 30 days prior to implementation of revision. The GRA reserves the right to require changes to any internal control or procedure to ensure compliance to applicable laws and regulations. Part III: add Section 3 SUPERVISION. Supervision must be provided at all times Pull Tabs is in operation by associates with authority equal to or greater than those being supervised. Part III Section 6: removed “For any pull tabs played at a Band Gaming Enterprise, the following regulations shall apply” after *Pull Tab Inventory* Part III Section 6(A): replaced “assure” with “ensure” after *to* Part III Section 6(E): replaced “Access to pull tabs shall be restricted to authorized employees” with “Pull tabs must be maintained in a secure location, accessible only to authorized associates, and with surveillance coverage adequate to identify associates accessing the area.” Part III Section 6(F): added “Exchanges” before *of*; replaced “from storage to the sale location shall be” with “between associates must be” before *secured* Part III: added Section 7



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**Each Gaming Enterprise shall come into compliance with changes no later than October 1, 2014.
Each Gaming Enterprise may petition the GRA Board for an extension of up to six (6) months.
Approval of an extension is discretionary.**