



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

**COMPLIMENTARY SERVICES OR ITEMS, PLAYER  
TRACKING & GAMING PROMOTIONS**

**Document No. DGR – 14**

**Effective: December 17, 2013**

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**I. SCOPE.** This document includes the Detailed Gaming Regulations for Complimentary Services or Items, Player Tracking and Gaming Promotions to be regulated and conducted in compliance with Title 15 of the Mille Lacs Band Statutes Annotated.

**II. GAME REGULATIONS APPLICABLE TO COMPLIMENTARY SERVICES OR ITEMS, PLAYER TRACKING AND GAMING PROMOTIONS.** A Gaming Enterprise shall comply with all requirements set forth in the Tribal-State Compacts, 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 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.

**III. SUPERVISION.** Supervision must be provided as needed for Complimentary Services and Items, Gaming Promotions and Player Tracking by supervisory level associates.

**IV. COMPLIMENTARY SERVICES AND ITEMS.**

**Section 1.** Complimentary services and items procedures must at minimum address the following:

- A. Associates authorized to approve the issuance of complimentary services, including levels of authorization;
- B. Limits and conditions on the approval and issuance of complimentary services or items;
- C. Making and documenting changes to conditions or limits on the approval and issuance of complimentary services or items;
- D. Documenting and recording the authorization, issuance, redemption, adjustments, overrides and voids of complimentary services or items, including cash and non-cash gifts; and
- E. Complimentary services and items not maintained by the player management system are subject to the same standards outlined within this section.

**Section 2.** Reports. At least monthly, Accounting, Information Technology or Audit associates that cannot grant or receive complimentary privileges shall prepare reports that include the following information:

- A. Name of patron who received the complimentary service or item;
- B. Name(s) of authorized issuer of the complimentary service or item;
- C. The actual cash value of the complimentary service or item;
- D. The type of complimentary service or item (i.e., food, beverage, etc.); and
- E. Date the complimentary service or item was issued.

**Section 3.** De minimis exception. The reports required by Section 2 above are not required to include complimentary services or items valued at fifty dollars (\$50.00) or less.

**Section 4.** Review of reports. Complimentary services and items records must be summarized and reviewed for proper authorization and compliance with established authorization thresholds.

- A. A detailed report of complimentary services or items must be prepared at least monthly.



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B. The detailed report must be forwarded to management for review.

**Section 5.** Noncompliance. Failure on the part of any associate to comply with the requirements of this regulation may result in adverse licensing action, up to and including revocation of a license.

**V. PLAYER TRACKING.** The following standards apply only to computerized player tracking systems that accumulate points that are subsequently redeemed by the patron for cash, merchandise, etc.

**Section 1.** The addition/deletion of points to player tracking accounts other than through an automated process related to actual play must be sufficiently documented (including substantiation of reasons for increases) and authorized or performed by supervisory associates of the player tracking, promotions or the initiating department.

A. The addition/deletion of points to player tracking accounts authorized by supervisory associates must be documented and randomly verified by Accounting/Audit associates on at least a quarterly basis.

B. The above requirements do not apply to the deletion of points related to inactive or closed accounts through an automated process.

**Section 2.** Associates who redeem points for patrons shall not have access to inactive or closed accounts without supervisory associate authorization. Documentation of such access and approval must be created and maintained.

**Section 3.** Patron identification must be required when redeeming points for cash or at any time points are being redeemed without a player tracking card.

**Section 4.** Changes to the player tracking system parameters, such as point structures and associate access, must be performed by supervisory associates independent of the department initiating the change. Alternatively, changes to player tracking system parameters may be performed by supervisory associates of the department initiating the change if sufficient documentation is generated and the propriety of the changes is randomly verified by associates independent of the department initiating the change on a monthly basis.

**Section 5.** Rules and policies for player tracking accounts including the awarding, redeeming and expiration of points must be prominently displayed or available for patron review at the Gaming Enterprise.

**VI. GAMING PROMOTIONS.** The rules of the gaming promotion must be displayed or made readily available to patrons upon request. Gaming promotion rules require GRA approval and must include the following:

**Section 1.** The rules of play;

**Section 2.** The nature and value of the associated prize(s) or cash award(s);

**Section 3.** Any restrictions or limitations on patron eligibility;

**Section 4.** The date(s), time(s) and location(s) for the associated promotional activity or activities;

**Section 5.** Any other restrictions or limitations, including any related to the claim of prizes or cash awards;

**Section 6.** The announcement date(s), time(s) and location(s) for the winning entry or entries; and



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**Section 7.** Rules governing promotions offered across multiple Gaming Enterprises, third party sponsored promotions and joint promotions involving third parties.

**VII. VARIANCES.** The Gaming Enterprise must establish, as approved by the GRA, the threshold levels at which variances to this regulation must be reviewed to determine the cause. Any such review must be documented.

**History.** Approved by Band Assembly on November 10, 2005. Changes to grammar and formatting where applicable. Change “shall” to “must” where applicable. Change “person” and “personnel” with “associate” where applicable. Change “customer” to “patron” where applicable. Add Part I: SCOPE. This section includes the Detailed Gaming Regulations for Complimentary Services or Items, Player Tracking and Gaming Promotions to be regulated and conducted in compliance with Title 15 of the Mille Lacs Band Statutes Annotated. Part II: Replace Section 1 (original) with Part II. GAME REGULATIONS APPLICABLE TO COMPLIMENTARY SERVICES OR ITEMS, PLAYER TRACKING AND GAMING PROMOTIONS. A Gaming Enterprise shall comply with all requirements set forth in the Tribal-State Compacts, 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 III: SUPERVISION. Supervision must be provided as needed for Complimentary Services and Items, Gaming Promotions and Player Tracking by supervisory level associates. Part IV: IV replaced Section 1, Section 2, Section 3 and Section 4 of the original document. COMPLIMENTARY SERVICES AND ITEMS. Complimentary services and items procedures must at minimum address the following: Associates authorized to approve the issuance of complimentary services, including levels of authorization; Limits and conditions on the approval and issuance of complimentary services or items; Making and documenting changes to conditions or limits on the approval and issuance of complimentary services or items; Documenting and recording the authorization, issuance, redemption, adjustments, overrides and voids of complimentary services or items, including cash and non-cash gifts; and Complimentary services and items not maintained by the player management system are subject to the same standards outlined within this section. Reports. At least monthly, Accounting, Information Technology, or Audit associates that cannot grant or receive complimentary privileges shall prepare reports that include the following information: Name of patron who received the complimentary service or item; Name(s) of authorized issuer of the complimentary service or item; The actual cash value of the complimentary service or item; The type of complimentary service or item (i.e., food, beverage, etc.); and Date the complimentary service or item was issued. De minimis exception. The reports required by Section 2 above are not required to include complimentary services or items valued at fifty dollars (\$50.00) or less. Review of reports. Complimentary services and items records must be summarized and reviewed for proper authorization and compliance with established authorization thresholds. A detailed report of complimentary services or items must be prepared at least monthly. The detailed report must be forwarded to management for review. Section 5 original document: added to Part IV as Section 5. Part V: added PLAYER TRACKING PLAYER TRACKING. The following standards apply only to computerized player tracking systems that accumulate points that are subsequently redeemed by the patron for cash, merchandise, etc. The addition/deletion of points to player tracking accounts other than through an automated process related to actual play must be sufficiently documented (including substantiation of reasons for increases) and authorized or performed by supervisory associates of the player tracking, promotions, or the initiating department. The addition/deletion of points to player tracking accounts authorized by supervisory associates must be documented and randomly verified by Accounting/Audit associates on at least a quarterly basis. The above requirements do not apply to the deletion of points related to inactive or closed accounts through an automated process. Associates who redeem points for patrons shall not have access to inactive or closed accounts without supervisory associate authorization. Documentation of such access and approval must be created and maintained. Patron identification must be required when redeeming points for cash or at any time points are being redeemed without a player tracking card. Changes to the player tracking system parameters, such as point structures and associate access, must be performed by supervisory associates independent of the department initiating the change. Alternatively, changes to player tracking system parameters may be performed by supervisory associates of the department



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initiating the change if sufficient documentation is generated and the propriety of the changes is randomly verified by associates independent of the department initiating the change on a monthly basis. Rules and policies for player tracking accounts including the awarding, redeeming and expiration of points must be prominently displayed or available for patron review at the Gaming Enterprise. Part VI: added GAMING PROMOTIONS. The rules of the gaming promotion must be displayed or made readily available to patrons upon request. Gaming promotion rules require GRA approval and must include the following: The rules of play; The nature and value of the associated prize(s) or cash award(s); Any restrictions or limitations on patron eligibility; The date(s), time(s), and location(s) for the associated promotional activity or activities; Any other restrictions or limitations, including any related to the claim of prizes or cash awards; The announcement date(s), time(s), and location(s) for the winning entry or entries; and Rules governing promotions offered across multiple Gaming Enterprises, third party sponsored promotions, and joint promotions involving third parties. Part VII: added VARIANCES. The Gaming Enterprise must establish, as approved by the GRA, the threshold levels at which variances to this regulation must be reviewed to determine the cause. Any such review must be documented.

**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.**