MISSOURI GAMING COMMISSION

MINIMUM INTERNAL CONTROL STANDARDS CHAPTER G - DROPS AND COUNTS

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§ 1 General

- 1.01 The minimum internal controls in this chapter apply to drops and counts of table game drop devices, poker table drop devices and bill validator (BV) cans, which are all collectively referred to as "drop devices."
- 1.02 The drops referred to in this chapter are defined as follows:
 - (A) the table game drop is the collection of revenue from buy-ins, including counter checks, and coupons deposited at the table;
 - (B) the poker table drop is the collection of revenue from poker games, including revenue from bad beat and special hands; and
 - (C) the EGD drop is the collection of revenue from the tickets, cash and coupons deposited in the BV can.
- 1.03 Locks for drop devices shall be maintained in a locked compartment in a secure location as identified in the internal controls.
- 1.04 The count team shall consist of members of the Count Department.
- 1.05 Drop devices that were missed during the scheduled drop which are later collected by the drop team for that same drop are not considered emergency drops. Emergency drops are drops which are required to be conducted prior to the next scheduled drop, such as for full or malfunctioning drop devices or game relocations.

§ 2 Table Game and Poker Table Drop Device Characteristics

- 2.01 Each table game in the casino shall have an attached drop device for deposited currency, coupons, counter check issue slips, all drop device copies of table transaction documents, and mutilated chips.
- 2.02 Each poker table in the casino shall have attached drop devices for the rake and any bad beat/special hands collection.
- 2.03 Each table game drop device shall have:
 - (A) a lock that secures the drop device to the table;
 - (B) a lock that secures the contents inside the drop device;
 - (C) a slot opening or mechanism through which all currency, documents, etc., shall be inserted;

- (D) a mechanical device that shall automatically close and lock the slot opening upon removal of the drop device from the table; and
- (E) a marking that is permanently imprinted and clearly visible that identifies the game and table number to which it is attached.
- 2.04 Each poker table drop device shall have:
 - (A) a lock, chain, or cable that secures the drop device to the table;
 - (B) a lock that secures the contents inside the drop device;
 - (C) a slot opening or mechanism through which all currency, documents, etc., shall be inserted:
 - (D) a mechanical device that shall automatically close and lock the slot opening upon removal of the drop device from the poker table, unless the drop box is transparent and visible to fixed surveillance coverage; and
 - (E) a marking that is permanently imprinted and clearly visible that identifies the game and table number to which it is attached, except for bad beat drop devices if the contents are consolidated in the poker room.

§ 3 Bill Validator (BV) Characteristics

- 3.01 Each EGD on the gaming floor and available for play shall have a BV can installed for storing deposited currency, tickets, and EGD coupons.
- 3.02 Each BV can shall be secured inside a locked compartment in the gaming device and shall have:
 - (A) a lock that secures the contents inside the BV can:
 - (B) a slot opening or mechanism through which all currency, coupons and tickets shall be inserted; and
 - (C) a method for identifying the EGD from which it is removed (i.e., permanently marked with the EGD number, bar-coded label, computer printed tag, or RFID microchip). If the EGD is identified with a removable tag, the tag shall be attached to the BV can. The method used shall be described in the Internal Control System.

§ 4 Count Room and Cart Storage Room Characteristics and Controls (11 CSR 45-8.100)

4.01 Describe in the Internal Control System the location and the layout of the count room and cart storage room.

- 4.02 A security officer shall inspect all containers, equipment, paperwork, and other items being removed from the count room or cart storage room; except for locked storage carts.
- 4.03 The count room and cart storage room shall provide maximum security for the items housed and activities conducted therein and shall have:
 - (A) steel doors and solid outer walls enclosing each room;
 - (B) no windows that can be opened;
 - (C) secured vents, ducts, flooring, and ceilings. The Internal Control System shall describe how these items are secured and the materials used to do so;
 - (D) clear, glass-like count tables for emptying, sorting, and counting the contents of the drop devices;
 - (E) a landline telephone; and
 - (F) only trash bags of clear design.
- 4.04 Access to either the count room or cart storage room shall be controlled by a dual locking system requiring two separate keys to access the room. One of the keys shall only be accessible by a security officer and the other key shall only be accessible to a count team member, table games supervisor, cashier, or an emergency drop team member other than a security employee. The only exceptions are as follows:
 - (A) Doors between the count room and the cart storage room shall be at least single locked with the key only accessible to a count team member; and
 - (B) Doors between the count room and the main bank shall be dual locked with one key accessible only to a count team member and the other key accessible to main bank personnel.
- 4.05 The dual locks to both the count room and the cart storage room shall be locked when the room is unoccupied. When the room is occupied, access shall be controlled by the count team members in the room or Surveillance.
- 4.06 The count room and cart storage room shall not contain any supplies and equipment not related to the count process, and shall not be used for storage of supplies. A water cooler utilizing transparent water jugs shall be allowed.
- 4.07 Each individual who enters the count room, except security, main bank cashier, internal/external auditors, and MGC personnel, shall wear an authorized one-piece, pocketless jumpsuit, as supplied by the Class B Licensee.
- 4.08 Once the count has begun any person exiting the count room, for any reason other than to complete the drop, shall remove his or her jumpsuit. A security officer shall observe the individual removing the jumpsuit to detect any assets that may have been concealed on

the employee's person. The jumpsuit shall be removed in the mantrap outside the count room or other area directly outside the count room door.

- 4.09 When handling cash, coupons, or chips, count team members and others accessing counting equipment shall not wear gloves in the count room. If a biohazard exists, clear gloves may be used while handling the contaminated drop contents and device.
- 4.10 When accessing the count room, at least two people shall be present in the room for the duration of the access.
- 4.11 No persons in the count room and cart storage room shall be permitted to carry a pocketbook or other similar container unless such container is transparent.
- 4.12 Non-transparent containers, other than currency/TITO/chip transport carts, may only be permitted in the count room and cart storage room if they are not placed within five feet of any currency in the room and they are inspected by a security officer upon removal from the room.
- 4.13 Only the following people may enter or leave the count room or cart storage room at any time:
 - (A) MGC personnel;
 - (B) count team members;
 - (C) security personnel for the following purposes:
 - (1) as an escort;
 - (2) retrieve and return drop carts; and
 - (3) verify all sensitive keys are returned to the count room key box;
 - (D) emergency drop team members:
 - (E) table games supervisor or cage cashier to retrieve and return table and poker drop devices for the drop team;
 - (F) count technician or MIS personnel to service equipment;
 - (G) external and internal auditors;
 - (H) main bank cashiers performing the buy under the following conditions:
 - (1) the count for which the buy is being performed has been completed; and
 - (2) any other funds in the count room are secured in their respective drop devices; and
 - (I) vendors who need to be in the count room to repair equipment only under the following conditions:
 - (1) a security officer must escort the persons while in the count room; and
 - (2) service vendors must have prior MGC approval.

4.14 Each individual, other than count room and MGC personnel, who enters the count room shall make an entry on the Ingress/Egress Log. Each logged individual who exits the count room shall record the time of exit.

§ 5 Collection and Transportation of Drop Devices

- 5.01 The Class B Licensee shall submit the current drop schedule to the MGC Jefferson City office and the MGC Boat Supervisor showing the times and days when the drop devices will be removed from the table games, poker tables and EGDs. (11 CSR 45-8.090)
 - (A) Table game and poker table drop devices shall be dropped at the end of each gaming day. If no tables in a pit have been opened for play during the gaming day a drop is not required for that pit.
 - (B) At a minimum all EGD BV cans shall be dropped at least once per gaming week at the end of Tuesday's gaming day. Taxes shall be estimated on non-drop days and reported on the Daily Tax Transmittal.
- 5.02 On non-24-hour gaming days the entire deck or floor where the BV drop is taking place shall be closed to the public until the drop is completed, unless a mechanism is in place which captures the drop meters at the time the BV can is removed from the EGD to avoid drop variances due to timing differences.
- 5.03 EGD BV drops shall be conducted by count team members who are independent of the Slot Department. At least two count team members and one security officer shall be present in order to conduct the EGD BV drop. When additional employees are used, a maximum 3:1 count employee to security officer ratio shall be maintained. Slot technicians shall only enter the drop area in order to assist with the opening or securing of drop compartments. Slot technicians shall not be considered a part of the drop team.
- 5.04 Table game and poker table drops shall be conducted by at least two (2) security officers.
- 5.05 An EGD drop area is defined as an area within a minimum five-foot radius of:
 - (A) any BV can that is being dropped;
 - (B) any EGD door opened for the drop process and not yet secured; and
 - (C) the open side of any drop storage cart containing funds until the cart is secured in the count room or drop cart storage room.
- 5.06 A sufficient number of security officers must be utilized to ensure that no access is allowed to the drop area by non-drop team members or patrons.

- 5.07 The drop team shall open the EGD drop compartment, remove the BV can and secure the EGD while security maintains control over the drop area.
- 5.08 The doors to EGDs shall not be opened ahead or left open outside of the secured drop area. The only exception is belly glass doors may be opened ahead of the drop area when the casino is closed to patrons.
- 5.09 During the collection of table game drop devices security shall position the drop storage cart inside the pit or at the end of the pit being dropped with the open side facing into the pit. Security shall collect the drop devices within the pit and directly transport them into the drop storage cart. The cart shall be locked prior to leaving the pit.
- 5.10 During the collection of the poker table drop, security shall position the drop storage cart in an unoccupied area of the poker room. A security officer shall escort the drop storage cart and ensure only drop team members are allowed access to the cart. Security shall collect the drop from each table and transport it directly to the drop storage cart. The cart shall be locked prior to leaving the poker room.
- 5.11 The transportation of table game and poker table drop devices containing funds shall be conducted using a locked drop storage cart. At least two security officers shall escort the cart until it is secured in the count room or cart storage room.
- 5.12 The transportation of EGD drop devices containing funds off the gaming floor shall be conducted using a locked drop storage cart. At least one count team member and one security officer shall escort the cart until it is secured in the count room or cart storage room.
- 5.13 Access to drop devices that contain funds shall be restricted to authorized members of the drop team, except for those removed during emergency drops. For those removed during emergency drops, access shall be restricted to those authorized members of the emergency drop team.
- 5.14 If a patron dispute occurs which requires access to the BV can contents, the following procedures shall be followed:
 - (A) surveillance and the MGC agent on duty shall be notified by slot personnel. Surveillance shall monitor the removal, opening, and replacement of the BV can;
 - (B) a slot technician with a security escort or cage cashier with a security escort shall check out the BV door and box release key and the BV can contents key;
 - (C) the slot technician or cage cashier shall remove the BV can and access the contents to settle the dispute;

- (D) all contents removed from the BV can that were metered shall be returned to the BV can prior to it being reinserted into the EGD;
- (E) the slot technician or cage cashier shall re-secure the BV can in the EGD;
- (F) the security officer shall verify the BV can is secure; and
- (G) the keys shall be directly returned to the sensitive key box.
- 5.15 Each drop device collection process, including transportation of drop devices, shall be continuously monitored and recorded by surveillance personnel, including emergency drops.
- 5.16 Drop and count team members, except security officers, assigned to the collection of drop devices shall wear a one-piece, pocketless jumpsuit or other apparel approved by MGC, as supplied by the Class B Licensee. Drop apparel shall be issued immediately prior to use by the Class B Licensee or Security shall inspect the drop apparel before each drop to ensure the drop apparel has not been altered (i.e. pockets sewn inside the jumpsuit).
- 5.17 Security Officers must be present for and observe the entire drop process. All drop devices shall be observed by security from the time the drop devices are no longer secured in the gaming device until the drop devices are secured in the count room or cart storage room.
- 5.18 The drop team shall only have access to the EGD compartments that hold drop devices. The drop team shall not have access to the contents of the CPU compartment.

§ 6 Count Standards

- 6.01 The count teams shall consist of at least three (3) employees who are independent of the transactions being counted and independent of the subsequent accountability of the count proceeds.
- 6.02 A security officer present at the count room door or a count team member present in the count room shall notify Surveillance prior to any person entering or leaving the count room. Surveillance shall document on the Surveillance Shift Log the time and the number of persons entering or leaving. The only exception is when a drop team member is entering or leaving the count room with security escort when delivering drop carts.
- 6.03 The physical transfer of funds from the count room during the count or before the main bank cashier has verified the total drop is strictly prohibited.
- 6.04 All items including paperwork removed from the count room shall be immediately inspected for casino assets by a security officer.

- 6.05 The count process is deemed complete when the main bank cashier has verified the count and the main bank cashier has taken accountability of the funds. The main bank cashier shall immediately transfer the funds to the main bank or vault.
- 6.06 All gaming drops shall be counted in the MGC-approved count room.
- 6.07 When the BV can count has begun or the table/poker count has begun, no other count shall be conducted in the count room until the main bank cashier has taken possession of and transferred the drop from that count to the main bank/vault; with the only exception being when the room is divided by a solid barrier into physically segregated areas, which prevents funds from being commingled.

§ 7 Counting and Recording the Count

- 7.01 The count team shall not enter the count room until at least three members are present. The count team shall enter the count room together to begin or resume the count. If at any time during the count a count team member must leave, resulting in less than three count team members in the room, the entire count team must exit the room.
- 7.02 Surveillance shall continuously monitor and record the count process from the time the count team enters the room until the buy is completed. (11 CSR 45-7.040)
- 7.03 All machines that will be used that day to count, strap, or sort currency, computer-generated counter checks, tickets, and coupons shall be tested prior to use in the count process. In order to test each machine, a manual count of the total dollar amount of the currency and counter checks shall be compared to the machine count. For tickets and coupons it is sufficient to compare a manual piece count of items to the machine count. Documentation of the testing shall be maintained with the count paperwork.
- 7.04 The Internal Control System shall include alternative procedures for conducting the counts if any counting machine, sorting machine, or casino computer system is not operational.
- 7.05 If any contents of the drop devices are manually counted (e.g., coupons, counter checks, etc.), the count shall be performed by at least two team members who shall independently count and record their counts on separate count sheets for each drop device. If the counts do not agree, the independent counts shall be repeated until they agree.
- 7.06 The label on each table game or poker table drop device shall be shown to the surveillance camera. The surveillance coverage shall provide sufficient clarity to identify the labels. For BV cans, the bar-coded label, computer printed tag, or RFID microchip shall be scanned into the computer system or the label manually entered into the system.

- 7.07 Drop devices shall be individually emptied on the count room table and counted. Bad beat/special hand collection bags shall be emptied on the count room table and counted.
- 7.08 The interior of each empty drop device or collection bag shall be shown to the surveillance camera and verified by another count team member.
- 7.09 The slot on the empty drop device shall be reset, if applicable; the door to the drop device shall be locked; and the drop device shall be returned to the drop storage cart.
- 7.10 All contents removed from each drop device shall remain on or above the count table or other work surface in plain view of surveillance until transferred to transport carts. If contents are accidentally dropped on the floor, a count team member shall clear his/her hands before picking up the contents and after returning the contents to the table. Count team members may not remove their hands from or return them to a position on or above the count table or other work surface, where funds are exposed, unless the backs and palms of their hands are first held out and exposed to other members of the count team and the surveillance cameras.
- 7.11 The count of the contents from each drop device or collection bag shall be recorded on the count sheet or into a computer system prior to commingling the funds with funds from other devices
- 7.12 All table games and poker paperwork shall be traced to or recorded on the count sheet. Orders for fill/credit, when used, shall be matched to the fill/credit slips.
- 7.13 When all assets have been counted, a count team member shall prepare one Master Gaming Report or a BV summary report(s) in the count room listing the correct count for each asset and the correct grand total.

§ 8 Procedures upon Completion of the Count

8.01 Each member of the count team present at the time the final count report (Master Gaming Report or BV summary report) is generated shall sign the final count report on the page that contains the grand total attesting to the accuracy of the information recorded. The lead count room representative shall ensure the names of the count team members who were not present for the final count report are listed on the same page of the report to indicate their presence during the count.

- 8.02 The lead count room representative shall ensure that surveillance is notified when the count is complete.
- 8.03 The main bank cashier shall enter the count room through the primary door and count the drop without prior knowledge of the count team's recorded amounts. The main bank cashier's count shall be compared to the applicable count report and variances shall be reconciled. The main bank cashier shall sign the applicable count report and transfer document, assume accountability of the count and transfer the drop to the main bank/vault without delay. The main bank cashier may push the currency cart through an adjacent door to the main bank/vault and re-lock the door from the count room side. A count team member shall re-lock the count room lock on that door. The main bank cashier's documentation shall remain with the cashier for inspection by a security officer upon exiting the count room through the primary door.
- 8.04 After each count, all count documentation, including any applicable computer storage media, final count report, tickets, coupons, counter check issue slips, and all supporting documents shall be inspected by a security officer and immediately delivered to Accounting in a tamper-resistant sealed container or a locked transport cart that is only accessible by Accounting. Alternatively, the documents shall be adequately secured (e.g., locked in a container to which only accounting personnel can gain access) until retrieved by Accounting.
- 8.05 Trash shall be collected and removed on a daily basis after the conclusion of the counts. Upon its removal from the count room, a security officer shall inspect the trash for any funds, tickets, or coupons.
- 8.06 At the completion of the count, all drop storage carts shall be locked and secured in the count room or cart storage room. If a manual key box is maintained in the count room, a security officer shall enter the count room with the lead count room representative to verify that all sensitive keys have been returned to the key box.

§ 9 Emergency Table Game and Poker Table Drops

9.01 The Class B Licensee shall maintain emergency table game and poker table drop devices with the same physical characteristics as noted above except for the markings. The emergency drop device shall be permanently marked with the word "EMERGENCY" and shall be marked with a clearly visible, temporary marking of the game and table number to which it is attached.

- 9.02 Empty emergency drop devices shall be maintained in a locked compartment or in a secured area. The storage location, including controls governing authorized access, shall be described in the Internal Control System.
- 9.03 The Internal Control System shall state which job titles are responsible for performing the emergency drop when the drop team is not available: one shall be a security officer and a second one shall be a Level I or Level II employee independent of the Table Game and Poker Departments. Security shall notify the MGC agent on duty and surveillance when an emergency drop is needed.
- 9.04 Upon removal, the replaced drop device shall be immediately transported to and secured in the cage, Main Bank, Count Room, or in a locked compartment in the mantrap. The emergency drop storage location shall be locked and secured to prevent unauthorized access. The storage location shall have dedicated surveillance coverage.
- 9.05 Any drop device removed during the emergency drop shall have its contents counted and included in the next table game count. If during the collection of the drop devices an emergency drop device is collected, the drop team shall go to the emergency drop storage location to collect the replaced drop device and transport it to the count room, unless the replaced drop device was initially delivered to the count room.

§ 10 Emergency Bill Validator (BV) Drops

- 10.01 The Class B Licensee shall maintain emergency BV cans with the same physical characteristics as noted above, except for the markings. The emergency BV cans shall be permanently marked with the word "EMERGENCY" and shall be marked with a clearly visible, temporary marking of the EGD number in which it is installed. BV cans with RFID chips are not required to be marked with the EGD number.
- 10.02 Empty emergency BV cans shall be maintained in a locked compartment or in a secured area. The storage location, including controls governing authorized access, shall be described in the Internal Control System.
- 10.03 The Internal Control System shall state which job titles are responsible for performing the emergency BV can drop when the drop team is not available: one shall be a security officer and a second one shall be a Level I or Level II employee independent of the Slot Department. A slot technician may assist the emergency drop team with removing drop devices. Security shall notify the on-duty MGC agent and surveillance when an emergency drop is needed.
- 10.04 Upon removal, the replaced drop device shall be immediately transported to and secured in the cage, Main Bank, Count Room, or in a locked compartment in the mantrap. The

emergency drop storage location shall be locked and secured to prevent unauthorized access. The storage location shall have dedicated surveillance coverage.

10.05 The drop device removed during the emergency BV drop shall have its contents counted and included during the next scheduled BV count for that device. If during the collection of the drop devices an emergency drop device is collected, the drop team shall go to the emergency drop storage location to collect the replaced drop device and transport it to the count room with security escort. Alternatively, the replaced drop device may be counted and included during the next scheduled BV count; provided the count team checks the emergency drop storage location during every drop to collect any replaced drop devices. The Internal Control System shall specify which method will be used.