MISSOURI GAMING COMMISSION

MINIMUM INTERNAL CONTROL STANDARDS
CHAPTER Q – DISASSOCIATED PERSONS

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§ 1 General

1.01 A Disassociated Person (DAP) is an individual who has self-reported as a problem gambler, completed and filed a formal application requesting to be excluded from the gaming floor of all Class B Licensees and who has been designated as a Disassociated Person upon approval of the application by the Missouri Gaming Commission.

1.02 A "List of Disassociated Persons" shall consist of those persons who have voluntarily complied with the provisions of 11 CSR 45-17.010 to 11 CSR 45-17.030 and have not been removed pursuant to 11 CSR 45-17.060.

1.03 The Class B Licensee shall establish procedures to allow patrons (who are not on the List of Disassociated Persons) to enact self-limiting options; e.g., removal from mailing list, restricted check cashing or player card privileges, limit or suspend credit privileges, and elimination from other promotions, etc. These procedures shall be immediately available in hard copy for patrons, employees and Commission personnel at the following locations: player's club, cage, security, casino operator, or any other department identified by the Gaming Commission or the Class B Licensee's Internal Control System.

§ 2 Procedures for Exclusion

2.01 The Class B Licensee shall:

(A) Download the updated List of Disassociated Persons (DAP List) from the designated MGC server at least once every seven calendar days and update DAP information in all associated applications within five calendar days of the download of new or updated information. The Internal Control System shall identify the applications that are required to be updated;

(B) Upon receipt of the DAP List or an addition to the List, flag any existing disassociated person's player account(s) or, if no account exists, create a new account for the disassociated person which clearly denotes that the individual is a disassociated person and is barred from entering the gaming floor or from receiving a player's card. A generic flag may be used to indicate the individual is barred from entry, however notes within the system shall clearly indicate the individual is a Missouri disassociated person. The Internal Control System shall specify which job position(s) is (are) responsible for flagging the accounts;

(C) Remove DAPs from all VIP or club member programs, within 5 calendar days of the download of new or updated information. Any joint account shall be severed;

(D) Remove DAPs from all mailing lists (including but not limited to electronic mail, marketing offers, slot club programs, coupon promotions, and other marketing promotions) within 5 calendar days of the download of new or updated information. This rule does not prohibit mass mailings to "Resident" or mass distributions not directed toward specific individuals;

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(E) Ensure the player's club, cage, table games, security, or any other department identified by the Gaming Commission or the Class B Licensee's Internal Control System that has a responsibility for detecting DAPs on the gaming floor have access to the Class B's most current DAP List or the current player account information;

(F) Maintain a current hard copy or electronic copy of the DAP List at the player's club, any table games pit where counter checks are issued, any cage that performs check cashing, processes credit card transactions, debit card transactions, credit applications, payments of taxable promotional winnings or taxable jackpots, issues or accepts credit instruments, or any other location designated by the Missouri Gaming Commission.

2.02 Prior to performing any of the following transactions with a patron the Class B Licensee shall require the patron to present valid, non-expired government-issued photo identification. The licensee shall perform two searches of the name listed on the identification in the downloaded DAP list, the player tracking system (if capable), or the MGC Web DAP List to determine whether the patron is a DAP. One search shall include a search of the first name and date of birth. The second search shall be by last name and date of birth. In the event a W-2G is prepared, the Class B Licensee will further verify the name listed on the identification is consistent with the name of the patron recorded on the W-2G. The Class B Licensee shall not perform the following transactions with a DAP:

(A) Check cashing;
(B) Cash advances;
(C) Credit card transactions;
(D) Processing credit applications;
(E) Issuance or acceptance of credit instruments;
(F) Debit card transactions;
(G) Payment of any taxable jackpots;
(H) Payment of any taxable promotional winnings or prizes; and
(I) Wire transfers.

2.03 The Class B Licensee shall void any jackpot won by a DAP in accordance with 11 CSR 45-5.065.

2.04 The Class B Licensee shall not enroll DAPs in any sweepstakes, tournaments, or other types of promotions. The Class B Licensee shall prior to awarding any sweepstakes, tournament, or promotional prize, verify the winner is not a DAP.

2.05 Prior to issuing or reprinting a player's card the Class B Licensee shall identify DAPs at the player's club by examining the patron's government-issued photo identification and conducting two searches to determine if the person is on the DAP List. One search shall

include a search of the first name and date of birth. The second search shall be by last name and date of birth.

(A) The searches shall be conducted using at least one of the following:
  (1) The player tracking system;
  (2) The MGC Web DAP List; or
  (3) A search of the downloaded DAP list in a spreadsheet format from the most recent download.

(B) The Class B Licensee shall specify in the Internal Control System the method to be used. If the MGC Web DAP List is used the Class B Licensee shall specify the alternative method to be used when the website is unavailable.

2.06 The Class B Licensee shall provide copies of patron records, including Win/Loss statements, to DAPs upon written request by the DAP, to the extent such information is provided to any other patron. The information provided to DAPs shall be available by mail, even if not available by mail to other patrons, following procedures approved by MGC.

§ 3 Access to the DAP List

3.01 The Class B Licensee shall maintain the DAP List in a manner to ensure the confidentiality of its content. The content of the DAP List outside of the exceptions contained in Chapter 11 CSR 45-17 shall not be disclosed to any party (including members of a DAP's immediate family) without the prior written approval of the Missouri Gaming Commission. Any DAP List that is disposed of shall be shredded or otherwise destroyed in a manner that its content cannot be accessed.

3.02 A Class B Licensee shall remove an employee's access to any in-house DAP system or any list containing DAP data within 72 hours if the employee's job duties no longer require access to the system.

§ 4 Discovery of a DAP

4.01 The Class B Licensee shall immediately notify the Security Department and the MGC boat agent on duty when a DAP is identified on an excursion gambling boat.

4.02 If a DAP is discovered on the gaming floor, a Security Incident Report shall be prepared by the Security Department. In addition to the information required on the Security Incident Report in Chapter R, reports pertaining to DAPs shall include:

(A) The date and time of identification;
(B) Employee making identification;
(C) DAP's full name and address;

(D) A description of the facts involved in the discovery;
(E) A surveillance photo of the DAP shall be taken at the time of the incident;
(F) Name of the MGC boat agent on duty who was notified; and
(G) The amount of any voided gambling game payout not awarded pursuant to 11 CSR 45-5.065, if any.

4.03 A copy of the Security Incident Report shall be forwarded to the MGC boat supervisor within 24 hours of the incident.

§ 5 Employees and Self-Exclusion

5.01 Employees on the DAP List shall not be assigned duties which would require them to participate as a player in any gambling activities on any Missouri excursion gambling boat.

§ 6 Procedures for Removal from the List of Disassociated Person

6.01 The Class B licensee shall download the updates at least once every seven calendar days for those individuals who have been removed from the List using the designated MGC server. The Class B licensee shall remove the DAP designation from each individual's account and all associated applications within five calendar days of the download. If a generic flag is used to denote that a person is barred from entry, this flag may remain in place if the person is still excluded from the property; however, the comments should be updated to include the new source of the exclusion and shall not state that the exclusion is based on the Missouri DAP program (i.e., the individual is self-excluded in another state or has been evicted by the property). The Internal Control System shall identify the applications that are required to be updated.

6.02 If the Class A or B licensee chooses to continue the exclusion status of any individual removed from the DAP List, all references and associated programs shall indicate the exclusion originates from the licensee, self-exclusion in another state, or non-voluntary exclusion in another state-. ~~without citing the MGC DAP Program~~ . No licensee shall indicate to any individual that has been removed from the DAP List that he or she is excluded from the casino based on the Missouri DAP List.

§ 7 Procedures for Reinstatement of Casino Privileges

7.01 The Class A or B licensee shall not be required to reinstate privileges for any person who has been removed from the DAP List. Examples of privileges include access to the gaming floor, gambling, marketing offers, promotions, check cashing, cash advances, etc.

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7.02 The licensee may send a document to the MGC granting the MGC the irrevocable authorization to rescind any prior notice of trespass sent to a former DAP for all persons removed from the DAP List.

7.03 Until the licensee has restored privileges to the person removed from the DAP List, the licensee shall not send to such person any marketing materials such as those described in section 2.01(D).

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