

**Title 11—DEPARTMENT OF PUBLIC SAFETY
Division 45—Missouri Gaming Commission
Chapter 4—Licenses**

ORDER OF RULEMAKING

By the authority vested in the Missouri Gaming Commission (MGC) under section 313.805, RSMo Supp. 2013, the commission amends a rule as follows:

11 CSR 45-4.010 Types of Licenses is amended.

A notice of proposed rulemaking containing the text of the proposed amendment was published in the *Missouri Register* on January 15, 2014 (39 MoReg 192). No changes have been made to the text of the proposed amendment, so it is not reprinted here. This proposed amendment becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: A public hearing was held on this proposed amendment on March 12, 2014. No one attended the public hearing. No written comments were received.

**Title 11—DEPARTMENT OF PUBLIC SAFETY
Division 45—Missouri Gaming Commission
Chapter 4—Licenses**

ORDER OF RULEMAKING

By the authority vested in the Missouri Gaming Commission (MGC) under section 313.805, RSMo Supp. 2013, the commission amends a rule as follows:

11 CSR 45-4.030 Application for Class A or Class B License is amended.

A notice of proposed rulemaking containing the text of the proposed amendment was published in the *Missouri Register* on January 15, 2014 (39 MoReg 196). No changes have been made to the text of the proposed amendment, so it is not reprinted here. This proposed amendment becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: A public hearing was held on this proposed amendment on March 12, 2014. No one attended the public hearing. No written comments were received.

**Title 11—DEPARTMENT OF PUBLIC SAFETY
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Chapter 4—Licenses**

ORDER OF RULEMAKING

By the authority vested in the Missouri Gaming Commission (MGC) under section 313.805, RSMo Supp. 2013, the commission amends a rule as follows:

11 CSR 45-4.055 Application Period and Fees for Class A and Class B Licenses is amended.

A notice of proposed rulemaking containing the text of the proposed amendment was published in the *Missouri Register* on January 15, 2014 (39 MoReg 196). No changes have been made to the text of the proposed amendment, so it is not reprinted here. This proposed amendment becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: A public hearing was held on this proposed amendment on March 12, 2014. No one attended the public hearing. No written comments were received.

**Title 11—DEPARTMENT OF PUBLIC SAFETY
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Chapter 4—Licenses**

ORDER OF RULEMAKING

By the authority vested in the Missouri Gaming Commission (MGC) under section 313.805, RSMo Supp. 2013, the commission amends a rule as follows:

**11 CSR 45-4.190 License Renewal and Continuing Suitability Requirement
is amended.**

A notice of proposed rulemaking containing the text of the proposed amendment was published in the *Missouri Register* on January 15, 2014 (39 MoReg 196–197). No changes have been made to the text of the proposed amendment, so it is not reprinted here. This proposed amendment becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: A public hearing was held on this proposed amendment on March 12, 2014. No one attended the public hearing. No written comments were received.

**Title 11—DEPARTMENT OF PUBLIC SAFETY
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ORDER OF RULEMAKING

By the authority vested in the Missouri Gaming Commission (MGC) under section 313.805, RSMo Supp. 2013, the commission amends a rule as follows:

11 CSR 45-4.200 Supplier's License is amended.

A notice of proposed rulemaking containing the text of the proposed amendment was published in the *Missouri Register* on January 15, 2014 (39 MoReg 197–198). No changes have been made to the text of the proposed amendment, so it is not reprinted here. This proposed amendment becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: A public hearing was held on this proposed amendment on March 12, 2014. No one attended the public hearing. No written comments were received.

**Title 11—DEPARTMENT OF PUBLIC SAFETY
Division 45—Missouri Gaming Commission
Chapter 4—Licenses**

ORDER OF RULEMAKING

By the authority vested in the Missouri Gaming Commission (MGC) under section 313.805, RSMo Supp. 2013, the commission amends a rule as follows:

11 CSR 45-4.380 is amended.

A notice of proposed rulemaking containing the text of the proposed amendment was published in the *Missouri Register* on January 15, 2014 (39 MoReg 201). Those sections with changes are reprinted here. This proposed amendment becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: A public hearing was held on this proposed amendment on March 12, 2014. No one attended the public hearing. Written comments were received from Mike Winter, Executive Director of the Missouri Gaming Association (MGA).

COMMENT: MGA stated that the removal of the one (1)-time nonrefundable fee would place a significant financial hardship on Level I and key licensees after termination from a Class A, Class B, or supplier. The revision does not include a sixty (60)-day period for key and Level I licensees to actively search for a new position in the industry. If the employee's license is scheduled to expire within sixty (60) days of termination, this revision would require the licensee to resubmit all of the paperwork and application filing fee once new employment is obtained. MGA question why this change is necessary and would request the commission revisit this issue.

RESPONSE AND EXPLANATION OF CHANGE: Staff agrees this is a one-time nonrefundable application filing fee, and made the requested change in section (1). In addition, the language that was added to section (6) has been removed.

**11 CSR 45-4.380 Occupational and Key Person/Key Business Entity License
Application and Annual Fees**

(1) The one (1)-time nonrefundable application filing fee shall be—

(6) Each occupational license shall expire biennially on the last day of the month of issue, but the licensing hearing shall be subject to being reopened at any time.

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Chapter 4—Licenses

ORDER OF RULEMAKING

By the authority vested in the Missouri Gaming Commission (MGC) under section 313.805, RSMo Supp. 2013, the commission amends a rule as follows:

11 CSR 45-4.420 Occupational License is amended.

A notice of proposed rulemaking containing the text of the proposed amendment was published in the *Missouri Register* on January 15, 2014 (39 MoReg 204). No changes have been made to the text of the proposed amendment, so it is not reprinted here. This proposed amendment becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: A public hearing was held on this proposed amendment on March 12, 2014. No one attended the public hearing. No written comments were received.

Title 11—DEPARTMENT OF PUBLIC SAFETY
Division 45—Missouri Gaming Commission
Chapter 10—Licensee’s Responsibilities

ORDER OF RULEMAKING

By the authority vested in the Missouri Gaming Commission (MGC) under section 313.805, RSMo Supp. 2013, the commission amends a rule as follows:

**11 CSR 45-10.020 Licensee’s and Applicant’s Duty to Disclose Changes in Information
is amended.**

A notice of proposed rulemaking containing the text of the proposed amendment was published in the *Missouri Register* on January 15, 2014 (39 MoReg 204–205). No changes have been made to the text of the proposed amendment, so it is not reprinted here. This proposed amendment becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: A public hearing was held on this proposed amendment on March 12, 2014. No one attended the public hearing. No written comments were received.

Title 11—DEPARTMENT OF PUBLIC SAFETY
Division 45—Missouri Gaming Commission
Chapter 4—Licenses

ORDER OF RULEMAKING

By the authority vested in the Missouri Gaming Commission (MGC) under section 313.805, RSMo Supp. 2013, the commission amends a rule as follows:

11 CSR 45-4.020 is amended.

A notice of proposed rulemaking containing the text of the proposed amendment was published in the *Missouri Register* on January 15, 2014 (39 MoReg 192–195). Those sections with changes are reprinted here. This proposed amendment becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: A public hearing was held on this proposed amendment on March 12, 2014. No one attended the public hearing. Written comments were received from Mike Winter, Executive Director of the Missouri Gaming Association (MGA). MGC staff also had two (2) comments.

COMMENT #1: Staff requested a revision to subsection (5)(A) to clarify that the general manager may be an employee of the Class A licensee.

RESPONSE AND EXPLANATION OF CHANGE: The staff agrees to add a statement to subsection (5)(A) to clarify that the general manager may be a Class A employee.

COMMENT #2: Occupational License Level II is any person not a key or Level I who has access to the gaming floor, or secured areas, as an employee of any Class A, Class B, or supplier licensee, and any other person directed by the commission or the executive director to file a Level II application. Some of our members receive assistance from corporate service groups. The removal of section (5) would negate the support and assistance provided by those entities. These corporate employees provide administrative support in the execution of operations across the entire enterprise. The elimination of their support would hinder business goals and is in direct conflict with the established organizational culture. This structure has been in place throughout the years without increased risk. The additional oversight into operations has reduced the risk of error. Corporate employees who provide on-site assistance and possess a Missouri Gaming Commission license can be held accountable by the state of Missouri.

11 CSR 45-4.190(2) states that the occupational licensees thereof shall have a continuing obligation to demonstrate suitability to hold a license by complying with all gaming laws and regulations. If the employee will not be allowed on-site access to the facility in Missouri, why will they be required to possess an occupational license?

RESPONSE AND EXPLANATION OF CHANGE: 11 CSR 45-4.020(7) has been revised to include employees of the Class A licensee in any position that would require the holder to have access to the excursion gambling boat or secured area to perform his or her function or duties.

COMMENT #3: Staff requested revisions to section (10) to clarify the language.
RESPONSE AND EXPLANATION OF CHANGE: Section (10) has been changed to clarify the language.

11 CSR 45-4.020 Licenses, Restrictions on Licenses, Licensing Authority of the Executive Director, and Other Definitions

(5) Each Class B licensee at a minimum shall individually staff the following Level I positions with employees of the Class B licensee, which shall not be combined with any other required position:

(A) General manager (may be a Class A employee);

(7) Occupational License Level II includes any of the following positions that are not required to hold an Occupational License Level I:

(A) Any position within a Class A or Class B licensee that would require the holder to have access to the excursion gambling boat or secured area to perform his or her function or duties; provided that agents and nongaming vendors are not considered within Occupational License Level I or II unless otherwise notified by the commission;

(B) Any position related to a Class B licensee in one (1) of the following areas: security, surveillance, audit, accounting, MIS, cage, ticketing, hard and soft count, and marine operations;

(10) A restricted Level II license is issued to an occupational Level II licensee under the age of twenty-one (21).

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ORDER OF RULEMAKING

By the authority vested in the Missouri Gaming Commission (MGC) under section 313.805, RSMo Supp. 2013, the commission amends a rule as follows:

11 CSR 45-4.260 is amended.

A notice of proposed rulemaking containing the text of the proposed amendment was published in the *Missouri Register* on January 15, 2014 (39 MoReg 198–200). Those sections with changes are reprinted here. This proposed amendment becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: A public hearing was held on this proposed amendment on March 12, 2014. No one attended the public hearing. Written comments were received from Mike Winter, Executive Director of the Missouri Gaming Association (MGA). The MGC staff had one (1) comment.

Due to the similarity of the following two (2) comments, they are addressed with one (1) response:

COMMENT #1: MGA questioned the changes to section (6) regarding poker tournament dealers noting that some MGA members will host numerous poker tournaments a year at our Missouri properties. The success of these tournaments depends on a company's ability to hire experienced poker dealers and supervisors for the event. These types of events are a huge generator of revenue for the state. This proposed change would have a significant and negative impact on a casino's ability to attract licensed poker dealers. The poker dealers used for some of these tournaments are part of a traveling circuit of dealers who only work special events such as these tournaments. These dealers are licensed in several states and it is feasible they could deal tournaments outside the state for a period longer than sixty (60) days and thus not be re-employed by a Missouri casino within sixty (60) days of terminating an employment relationship. Rescinding their licenses and eliminating their ability to self-renew would require dealers to fill out an entirely new gaming application packet as opposed to completing the five (5) page self-renewal application. This process would reduce the number of licensed poker dealers able and willing to deal tournaments in Missouri. Special event tournaments require poker dealers who have significant specialized experience. This regulation if enacted without carving out an exception for the traveling circuit of special event poker dealers would have a negative impact on our member's ability to hire the best talent for its big poker tournaments. If they are not able to obtain the best dealers they will not have a successful revenue generating event.

COMMENT #2: MGA questioned the changes to section (6) regarding all other licensees, noting that MGA feels strongly that any licensee who pays for a one (1)/two

(2)-year license should be allowed to keep their license active until their expiration date. Licensees should not have to reapply for a license and pay an application and license fee if they decide to return to work at a casino. If the commission elects to move forward with the regulation as proposed, any licensee whose license is proposed to be terminated in this fashion should receive a prorated refund for the amount of time remaining on the license. MGA stated that as an industry, they want to encourage people to work in their industry, not discourage them.

RESPONSE AND EXPLANATION OF CHANGE: The rescission of the occupational license after sixty (60) days has been removed, and replaced with a provision placing these individuals into a casino restricted status. Casino restricted status allows the licensee to keep his/her license until the license expires or is otherwise terminated. Due to this change, the private fiscal note is no longer applicable.

COMMENT #3: A staff member requested section (6) be revised to include a key person.

RESPONSE AND EXPLANATION OF CHANGE: Staff concurs and has made the change.

11 CSR 45-4.260 Occupational Licenses for Class A, Class B, and Suppliers

(6) If the employment of a key person, Level I, or Level II occupational licensee with a Class A, Class B, or supplier licensee is terminated for any reason, then the occupational license will be placed into a casino restricted status. Casino restricted status is the status assigned to an occupational licensee with a valid license who is not employed by a Class A, Class B, or supplier licensee.

REVISED PRIVATE COST: Due to comments received by MGC, changes were made which significantly reduced the cost of the proposed amendment to private entities. This proposed amendment will not cost private entities more than five hundred dollars (\$500) in the aggregate. The costs detailed in the original private fiscal note no longer apply.

**Title 11—DEPARTMENT OF PUBLIC SAFETY
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Chapter 4—Licenses**

ORDER OF RULEMAKING

By the authority vested in the Missouri Gaming Commission (MGC) under section 313.805, RSMo Supp. 2013, the commission amends a rule as follows:

11 CSR 45-4.390 Occupational License Renewal is amended.

A notice of proposed rulemaking containing the text of the proposed amendment was published in the *Missouri Register* on January 15, 2014 (39 MoReg 201–202). No changes have been made to the text of the proposed amendment, so it is not reprinted here. This proposed amendment becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: A public hearing was held on this proposed amendment on March 12, 2014. No one attended the public hearing. No written comments were received.

**Title 11—DEPARTMENT OF PUBLIC SAFETY
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Chapter 4—Licenses**

ORDER OF RULEMAKING

By the authority vested in the Missouri Gaming Commission (MGC) under section 313.805, RSMo Supp. 2013, the commission amends a rule as follows:

11 CSR 45-4.400 Licensee Performance of Duties is amended.

A notice of proposed rulemaking containing the text of the proposed amendment was published in the *Missouri Register* on January 15, 2014 (39 MoReg 203). No changes have been made to the text of the proposed amendment, so it is not reprinted here. This proposed amendment becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: A public hearing was held on this proposed amendment on March 12, 2014. No one attended the public hearing. No written comments were received.

Title 11—DEPARTMENT OF PUBLIC SAFETY
Division 45—Missouri Gaming Commission
Chapter 4—Licenses

ORDER OF RULEMAKING

By the authority vested in the Missouri Gaming Commission (MGC) under section 313.805, RSMo Supp. 2013, the commission amends a rule as follows:

11 CSR 45-4.410 is amended.

A notice of proposed rulemaking containing the text of the proposed amendment was published in the *Missouri Register* on January 15, 2014 (39 MoReg 203–204). Those sections with changes are reprinted here. This proposed amendment becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: A public hearing was held on this proposed amendment on March 12, 2014. No one attended the public hearing. Written comments were received from Mike Winter, Executive Director of the Missouri Gaming Association (MGA).

COMMENT #1: MGA questioned the changes to section (1) regarding corporate employees officing out of a Missouri property and employees with regional areas of responsibility. Several of MGA's members who own properties in Missouri also operate casinos in other jurisdictions. It is a sound business decision to have corporate employees and property employees with regional areas of responsibility office out of a Missouri property. There are a number of factors considered when deciding to locate them in Missouri including proximity to airports, number and proximity of casinos for which they have responsibility and amount of revenue generated by the properties.

These employees have offices at a Missouri property, have duties at the Missouri property, and play a vital part in ensuring the casinos in their regional area of control, which includes Missouri, are successful at generating revenue for the state and the organization.

These employees are corporate and functional leaders with subject matter expertise. It is impractical to require corporate employees or employees with regional responsibilities to stop by Security every day to obtain and return the visitor's badge to enter the premises while performing the duties for which they are paid. These team members need access to the front and back of house. Additionally, if licensed they should have access to the casino floor without the requirement of an escort. These employees submit to the same background check processes as property employees. They have the same license issued by the commission as do property specific employees. Thus, it is unclear what the perceived risk is in allowing them to have a property access badge based on their status as corporate employees. MGA practices are consistent with the business practices of all other corporations doing business in the state of Missouri.

While it is true that they are not employees of the Class B licensee, it is equally true they are not visitors.

The more accurate description is that these people are employees of the Class A licensee, intentionally and strategically officed out of the Class B licensed property. They are employees with daily responsibilities at that and other regional properties. The work performed by these employees directly and indirectly benefit the Class B licensed property. These employees all have Level I or Level II Missouri gaming licenses. The regulation allows them to be licensed in the state and perform their job duties in the state, but denies them access to their physical workplace. Without a property access badge these employees are unable to access their work area before or after hours without an escort to perform the duties of their positions. This is an impractical approach and stifles a company's ability to operate strategically as a business within the state of Missouri.

If this change is viewed in the narrowest interpretation it would seem that casinos with corporate employees or employees with regional areas of responsibility do not have any feasible alternatives outside of relocating these employees to other jurisdictions. MGA questions if that is the commission's intent but if that is the result, it would have the effect of reducing our employees in Missouri and the employment taxes paid by our members. Should the Class A licensee be required to relocate its corporate or regional team members outside of the state, the impact to the state is not correctly depicted in the private entity fiscal note.

RESPONSE AND EXPLANATION OF CHANGE: An exception was added to allow corporate employees with job responsibilities at more than one Class B licensee to obtain casino access badges. No change was made to allow employees of the Class B licensee to obtain casino access badges for more than one property.

COMMENT #2: MGA questioned the changes to section (1) regarding corporate employees with Missouri gaming licenses who need to access the properties for legitimate business purposes. MGA's members continue to strive to make all of our properties successful revenue generators. To successfully implement some of these plans, our Missouri properties will need to partner with the corporate team leaders. This partnership will sometimes require corporate team members to be physically present at the property. These are corporate business partners responsible for implementing companywide initiatives successfully across the brand where they have areas of responsibility. These team members are also licensed by the commission to work at the properties in the state. They have undergone the necessary background checks and been found worthy of a Missouri gaming license.

As an industry MGA struggles to understand the risk to gaming in this state by allowing licensed team members to have documented access to the properties owned by the parent company for legitimate business purposes.

RESPONSE AND EXPLANATION OF CHANGE: An exception was added to allow corporate employees with job responsibilities at more than one Class B licensee to obtain casino access badges.

11 CSR 45-4.410 Identification Badge Requirements

(1) All employees and occupational licensees shall at all times while performing the functions of their positions display on their person in a clearly visible manner a valid, riverboat-issued, casino access badge, unless a waiver has been granted in writing for a particular job function. No casino access badge granting access to any riverboat gaming operation may be held by any person unless that person is an employee of the Class B licensee and has been authorized for such access by the Class B applicant or licensee of the riverboat gaming operation for which the badge is to be issued. Each Class B applicant or licensee must notify the commission that such authorization has been granted before any identification badge may be issued to the person. Each Class B applicant or licensee must notify the commission within ten (10) days if any such authorization has been revoked. General managers, other key person licensees, internal auditors who are employees of the Class A licensee, and Class A employees who have job responsibilities that require them to work at more than one (1) Class B facility may also be granted casino access badges. All other employees of the Class A licensee must obtain and display a visitor badge while performing the functions of their positions at the riverboat gaming operation.

**Title 11—DEPARTMENT OF PUBLIC SAFETY
Division 45—Missouri Gaming Commission
Chapter 13—Hearings**

ORDER OF RULEMAKING

By the authority vested in the Missouri Gaming Commission (MGC) under section 313.805, RSMo Supp. 2013, the commission amends a rule as follows:

11 CSR 45-13.030 is amended.

A notice of proposed rulemaking containing the text of the proposed amendment was published in the *Missouri Register* on January 15, 2014 (39 MoReg 205–206). Those sections with changes are reprinted here. This proposed amendment becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: A public hearing was held on this proposed amendment on March 12, 2014. No one attended the public hearing. The MGC staff had one (1) comment. No written comments were received.

COMMENT #1: Staff requested subsections (2)(E) and (F) be revised to make them consistent with the changes made to 11 CSR 45-4.260(6).

RESPONSE AND EXPLANATION OF CHANGE: Staff agreed and made the changes.

11 CSR 45-13.030 Requests for Hearings

(2) A request for hearing must be submitted within thirty (30) days from the date of mailing by the commission of the decision or issue about which the petitioner requests a hearing.

(E) Other than disciplinary actions recommending the revocation of an occupational license, no Preliminary Order of Discipline shall be issued for an occupational licensee whose license has been placed in a casino restricted status, terminated, or has expired prior to the entry of said order.

(F) Other than disciplinary actions recommending the revocation of an occupational license, if the petitioner's occupational license has been placed in a casino restricted status, terminated, or has expired prior to the entry by the commission of a Final Order of Discipline, then the Preliminary Order of Discipline shall be rescinded, and the petitioner's request for hearing shall be denied and stricken.

**Title 11—DEPARTMENT OF PUBLIC SAFETY
Division 45—Missouri Gaming Commission
Chapter 4—Licenses**

ORDER OF RULEMAKING

By the authority vested in the Missouri Gaming Commission (MGC) under section 313.805, RSMo Supp. 2013, the commission rescinds a rule as follows:

11 CSR 45-4.205 Affiliate Supplier's License is rescinded.

A notice of proposed rulemaking containing the proposed rescission was published in the *Missouri Register* on January 15, 2014 (39 MoReg 198). No changes have been made to the proposed rescission, so it is not reprinted here. This proposed rescission becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: A public hearing was held on this proposed rescission on March 12, 2014. No one attended the public hearing. No written comments were received.

Title 11—DEPARTMENT OF PUBLIC SAFETY
Division 45—Missouri Gaming Commission
Chapter 7—Security and Surveillance

ORDER OF RULEMAKING

By the authority vested in the Missouri Gaming Commission (MGC) under section 313.805, RSMo Supp. 2013, the commission adopts a rule as follows:

11 CSR 45-7.170 Access to Areas of Class B Licensee Facilities is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on January 15, 2014 (39 MoReg 204). No changes have been made to the text of the proposed rule, so it is not reprinted here. This proposed rule becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: A public hearing was held on this proposed rule on March 12, 2014. No one attended the public hearing. One (1) written comment was received from Mike Winter, Executive Director of the Missouri Gaming Association (MGA).

COMMENT: MGA stated it is their belief that section (3) would eliminate the variance requiring the obligation to escort vendors on the casino floor after they have reached the two (2)-hour threshold. MGA would like clarification if its understanding is correct.

RESPONSE: Yes, Variance 17514-10B will expire with the rewrite of 11 CSR 45-4.020 and the adoption of 11 CSR 45-7.170. No changes have been made to the proposed rule.

**Title 11—DEPARTMENT OF PUBLIC SAFETY
Division 45—Missouri Gaming Commission
Chapter 9—Internal Control System**

ORDER OF RULEMAKING

By the authority vested in the Missouri Gaming Commission (MGC) under section 313.805, RSMo Supp. 2013, the commission amends a rule as follows:

11 CSR 45-9.113 Minimum Internal Control Standards (MICS)—Chapter M **is amended.**

A notice of proposed rulemaking containing the text of the proposed amendment was published in the *Missouri Register* on January 15, 2014 (39 MoReg 204–205). No changes have been made to the *Minimum Internal Control Standards* (MICS) as incorporated by reference in Chapter M. No changes have been made to the text of the proposed amendment, so it is not reprinted here. This proposed amendment becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: A public hearing was held on this proposed amendment on March 12, 2014. No one attended the public hearing. No written comments were received.

MISSOURI GAMING COMMISSION
MINIMUM INTERNAL CONTROL STANDARDS
CHAPTER M – SURVEILLANCE

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Note: Sections 313.800 through 313.850, RSMo, et seq., and Title 11, Division 45 of the Code of State Regulations establish standards to which Class B licensees must comply. Class B licensees should review these statutes and rules to ensure their ICS includes compliance with the requirements set forth. Revised January 30, 2011. Revised August 30, 2014 (revised 1.02, 3.01; deleted 4.04)

MINIMUM INTERNAL CONTROL STANDARDS
CHAPTER M – SURVEILLANCE
(11 CSR 45-7)

§ 1 General

- 1.01 Closed circuit surveillance systems and surveillance coverage shall continuously comply with all requirements of 11 CSR 45-7 and the MICS.
- 1.02 The Surveillance Department shall be independent of all other departments. The Surveillance Director shall report directly to an organizational level above that of General Manager.
- 1.03 Unless otherwise specifically authorized by MGC, only Surveillance and MGC personnel shall be permitted direct or indirect control, use of, or access to Surveillance Department camera systems. Security may operate a closed circuit television (CCTV) system to monitor non-gaming areas. Surveillance may have access or override authority for Security’s CCTV. However, Security shall not have access to the gaming system operated by Surveillance.
- 1.04 The General Manager may have a surveillance monitor and related equipment necessary to select and direct various Surveillance Department cameras; however, both the Surveillance Department and MGC shall be able to override the controls in the General Manager’s office. The General Manager shall not have the capability to monitor any camera inside the Surveillance Department. A video recorder shall be maintained by the Surveillance Department that records all video displayed on the General Manager’s monitor. Video recordings from the General Manager’s recorder shall be maintained by the Surveillance Department for at least 30 days and be immediately available to any Commission agent upon request.
- 1.05 Surveillance personnel shall have no other gaming related duties within the riverboat gaming operation. (11 CSR 45-7.050(1)(C))
- 1.06 Surveillance personnel shall possess, but are not required to display, a valid riverboat-issued casino access badge and a commission-issued occupational license badge while on property. Surveillance personnel shall still comply with 11 CSR 45-12.090 and 11 CSR 45-5.030 which prohibits employees from playing any gambling game, or receiving or consuming any intoxicating liquor while on the premises.
- 1.07 A copy of the current casino floor plan showing the placement of all surveillance cameras shall be provided for the MGC surveillance room within 24 hours of any change.
- 1.08 All required dedicated camera coverage shall remain in the MGC approved position. When changes to required dedicated camera coverage are needed, the MGC boat agent on duty shall approve the new coverage prior to use.

Note: Sections 313.800 through 313.850, RSMo, et seq., and Title 11, Division 45 of the Code of State Regulations establish standards to which Class B licensees must comply. Class B licensees should review these statutes and rules to ensure their ICS includes compliance with the requirements set forth. Revised January 30, 2011. Revised August 30, 2014 (revised 1.02, 3.01; deleted 4.04)

MINIMUM INTERNAL CONTROL STANDARDS
CHAPTER M – SURVEILLANCE
(11 CSR 45-7)

§ 2 Surveillance Requirements

- 2.01 Surveillance coverage of slot machines shall provide sufficient clarity to read both the asset number and game outcome with the same camera.
- 2.02 Surveillance coverage of table games and poker shall meet the following standards:
- (A) Fixed cameras shall provide views that enable a layperson to clearly determine table number, chip values, cash denominations, card values (including pips, face cards [K, Q or J] and, if relevant, suits), and game outcome (e.g., ability to reconstruct hands) excluding dice values on craps tables. Dedicated coverage of the game outcome on table games is only required for games which do not have an automated game history that records at least the last 50 rounds of play;
 - (B) Table bank trays, betting areas and card placement shall be continuously covered. Rail-to-rail fixed coverage is not required;
 - (C) Player's and Dealer's hands shall be recorded by Surveillance anytime the person's hands touch cards, chips in the betting area, or the chip tray. If table size or field of view is such that one fixed camera cannot provide the required coverage, whatever number of cameras needed to meet the coverage requirements shall be used;
 - (D) If PTZ cameras are used to provide the required continuous coverage, they shall be locked in position dedicated to that location and shall function as a fixed camera; and
 - (E) Any signage displaying the value of a progressive or bad beat award shall have dedicated coverage.
- 2.03 Surveillance coverage in the cage shall be recorded with sufficient clarity to identify all paperwork and the denomination of chips and currency.
- 2.04 Surveillance coverage of the entry and exit turnstile areas shall be sufficiently clear to permit verification of admission counts and identification of persons.
- 2.05 Panic alarms shall be audible in Surveillance.

§ 3 Surveillance Room Access and Control

- 3.01 Unless otherwise specifically authorized by MGC, access to the surveillance room is restricted to Surveillance and MGC personnel. Any other person needing access to the surveillance room shall obtain prior permission of the MGC and their access shall be recorded on a Surveillance Ingress/Egress Log. (11 CSR 45-7.050)
- 3.02 The MGC Boat Supervisor shall be notified prior to internal or external auditors accessing the surveillance room. Auditor access shall be limited to the following:

Note: Sections 313.800 through 313.850, RSMo, et seq., and Title 11, Division 45 of the Code of State Regulations establish standards to which Class B licensees must comply. Class B licensees should review these statutes and rules to ensure their ICS includes compliance with the requirements set forth. Revised January 30, 2011. Revised August 30, 2014 (revised 1.02, 3.01; deleted 4.04)

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- (A) Internal Audit may access the surveillance room to perform audit work up to 30 hours per calendar quarter; and
- (B) External Audit personnel may access the surveillance room to perform audit work up to 15 hours per calendar quarter.

3.03 The surveillance equipment in the MGC surveillance room shall be able to monitor and record without being overridden. Only MGC personnel shall have the ability to monitor the camera(s) required by 11 CSR 45-7.050 installed in the casino surveillance room.

§ 4 Operations

4.01 Describe in the Internal Control System the procedures to be followed by surveillance personnel during their shift including:

- (A) inspection of equipment;
- (B) testing procedures of equipment;
- (C) video recording media maintenance;
- (D) retention and release of video recordings; and
- (E) preparation of shift logs, incident reports, and other forms.

4.02 Surveillance personnel shall video record in its entirety and continuously monitor all drops and counts, including drops and counts of pooled dealer, cage cashier and slot attendant tips.

4.03 A Surveillance Release Log shall be maintained recording who receives a copy of video recordings. Video recordings of criminal or regulatory investigations or violations shall not be released to anyone without the approval of an MGC agent.

4.04 At least three Surveillance personnel per excursion gambling boat shall be on duty in the surveillance room actively monitoring gaming activities when gaming, drops, or counts are being conducted. Additional personnel shall be available to provide required live observation and other duties and to allow for meals and breaks.

4.05 Whenever panic alarms are activated the MGC boat agent on duty and Security shall be notified. Tests of all panic alarms shall be conducted by Surveillance at least once each calendar month and documented in the Surveillance Shift Log.

§ 5 Records (11 CSR 45-7.070)

5.01 A Surveillance Shift Log shall:

- (A) be continuously maintained by Surveillance personnel;

Note: Sections 313.800 through 313.850, RSMo, et seq., and Title 11, Division 45 of the Code of State Regulations establish standards to which Class B licensees must comply. Class B licensees should review these statutes and rules to ensure their ICS includes compliance with the requirements set forth. Revised January 30, 2011. Revised August 30, 2014 (revised 1.02, 3.01; deleted 4.04)

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- (B) be chronological;
- (C) include entries for:
 - (1) the notification of any maintenance or repair of any gaming device or money handling equipment;
 - (2) gaming table drop box exchanges;
 - (3) any detention or questioning of patrons or employees by the Security department, including the identity of:
 - (a) the patrons or employees; and
 - (b) the Security personnel involved;
 - (4) the beginning, end, and any interruptions of all required drop and count processes, specifying which drop or count is being conducted (including emergency drops);
 - (5) any observed procedural or Internal Control violations;
 - (6) any observed criminal activity;
 - (7) any surveillance conducted on anyone or any activity that appears:
 - (a) to be abnormal, irregular, illegal or an emergency; or
 - (b) to violate the rules of the commission;
 - (8) any surveillance conducted at the request of:
 - (a) an employee of the Class B Licensee; or
 - (b) a commission agent;
 - (9) all persons reviewing surveillance recordings;
 - (10) all persons entering and exiting the Surveillance room, excluding surveillance personnel and MGC personnel;
 - (11) all surveillance personnel entering and exiting the Surveillance room only at the beginning and ending of their shifts; and
 - (12) any other notations deemed necessary by Surveillance personnel or the commission to ensure compliance with the statutes, regulations, and MICS;
- (D) be provided to the MGC Boat Supervisor daily; and
- (E) be retained for at least one (1) year.

5.02 A Surveillance Incident Report shall:

- (A) be made by the person responsible for monitoring the activity;
- (B) contain details of any incident observed that involved abnormal or criminal activity;
- (C) be provided to the MGC Boat Supervisor daily; and
- (D) be retained a minimum of one (1) year.

5.03 All Surveillance department video recordings, logs, and reports shall: (11 CSR 45-7.080)

- (A) be retained in a manner to allow them to be easily retrieved by date; and
- (B) be furnished to any MGC agent immediately upon request.

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§ 6 Chain of Evidence

- 6.01 Include in the Internal Control System the procedures for maintaining, copying and releasing any video recordings which contain suspected illegal activities or violations of regulations, MICS, or internal controls. Ensure the MGC boat agent on duty is notified immediately of suspected illegal activity and of the video recording's existence.

Note: Sections 313.800 through 313.850, RSMo, et seq., and Title 11, Division 45 of the Code of State Regulations establish standards to which Class B licensees must comply. Class B licensees should review these statutes and rules to ensure their ICS includes compliance with the requirements set forth. Revised January 30, 2011. Revised August 30, 2014 (revised 1.02, 3.01; deleted 4.04)

Title 11—DEPARTMENT OF PUBLIC SAFETY
Division 45—Missouri Gaming Commission
Chapter 9—Internal Control System

ORDER OF RULEMAKING

By the authority vested in the Missouri Gaming Commission (MGC) under section 313.805, RSMo Supp. 2013, the commission amends a rule as follows:

11 CSR 45-9.118 Minimum Internal Control Standards (MICS)—Chapter R **is amended.**

A notice of proposed rulemaking containing the text of the proposed amendment was published in the *Missouri Register* on January 15, 2014 (39 MoReg 205). No changes have been made to the *Minimum Internal Control Standards* (MICS) as incorporated by reference in Chapter R. No changes have been made to the text of the proposed amendment, so it is not reprinted here. This proposed amendment becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: A public hearing was held on this proposed amendment on March 12, 2014. No one attended the public hearing. One (1) written comment was received from Mike Winter, Executive Director of the Missouri Gaming Association (MGA).

COMMENT: Chapter R § 7.01(E) – While there are no significant issues with the changes as proposed, MGA would request to have the option of using the procedure of the supervisor reviewing and signing the Multiple Transaction Log to continue.

RESPONSE: This is allowed, but not required. The MICS represents the minimum internal control standards and the casinos may always implement more restrictive controls.

MISSOURI GAMING COMMISSION
MINIMUM INTERNAL CONTROL STANDARDS
CHAPTER R – FORMS

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§ 2 General

- 2.01 The forms index is not an all-inclusive list of forms to be used by the Class B Licensee. The Internal Control System shall include a copy of each form discussed in the Class B Licensee's Internal Control System and each form shall be listed in a forms index and a description of required information shall be included in Forms Description section.
- 2.02 The Class B Licensee shall use the forms approved in Chapter R of the Internal Control System.
- 2.03 All information shall be recorded in ink or other permanent form. Monetary corrections to a figure originally recorded may only be made in ink by crossing out the error, entering the correct figure, and obtaining the initials of the employee making the change and the initials of the employee's supervisor. Non-monetary corrections shall be initialed by the employee making the correction. If an Accounting Department employee makes the corrections after the completion and transfer of the documentation, that individual shall initial the correction(s) and include their MGC license number.
- 2.04 All forms shall include the Class B Licensee's name and title of the form.
- 2.05 Any forms that are not pre-numbered shall be maintained and controlled by the applicable department manager.
- 2.06 When a multi-part form is required, ensure that each part is distinguishable.
- 2.07 When multi-part forms are required on non-prenumbered forms, the required number of copies may be computer-printed, instead of using a multi-part form. However, original signatures are required on all copies.
- 2.08 Forms provided by the commission shall not be altered if used to satisfy the forms required by this chapter.

§ 3 Signatures

- 3.01 All signatures shall include the employee's first initial, last name, and the last six digits of the MGC license number which shall be legible.
- 3.02 The Class B Licensee shall indicate in the forms section which forms have an electronic signature. An electronic signature is acceptable only when the signature is auto populated to the form from the employee's login by the computer system. The signature

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cannot be manually keyed into the report to meet the requirement of an electronic signature.

§ 4 Control of Forms

4.01 Accounting shall be responsible for the receipt, control, and issuance of pre-numbered forms until the applicable operating department receives custody.

§ 5 Numbering

5.01 All manual control forms shall be pre-numbered by the manufacturer.

5.02 All computerized forms shall be sequentially numbered by the computer system.

§ 6 Voiding Forms

6.01 In the event a form has to be voided, the original and all copies shall be marked “void” and accompanied by the signature of the employee voiding the form and an employee verifying the void, with a brief explanation of why it was voided. If a void is required because a sequentially numbered form failed to print, this information, along with the form control number, date, and time, shall be recorded on a supplemental document and retained.

§ 7 Forms Description

7.01 The following represents the forms required by the MICS and the minimum standard information required for each form.

(A) Cards/Dice Inventory Ledgers

- 1) date of receipt, count, or issuance
- 2) quantity of each style/color of cards and dice received/issued
- 3) balance of inventory on hand
- 4) required signatures

(B) Cards and Dice Cancellation/Destruction Log

- 1) date
- 2) date and time of cancellation or destruction
- 3) quantity of decks and dice repackaged, canceled, and/or destroyed
- 4) required signatures

(C) Card and Dice Pit Storage Log

- 1) date
- 2) quantity and description of all cards and dice placed in the compartment

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- 3) quantity and description of all cards and dice removed from the compartment
 - 4) current number of each design and color combination of cards and dice
 - 5) log entry documenting the daily verification of the current inventory
- (D) Cashier/Bank Count Sheet
- 1) date and time
 - 2) location of bank
 - 3) amount of each type and denomination of funds;
 - 4) actual count total (closing inventory)
 - 5) accountability total
 - 6) amount of overages or shortages
 - 7) required signatures
- (E) Casino/Cage Multiple Transaction Log
- 1) Location–Casino cage/bank where cash transaction(s) occurred.
 - 2) Date–Date of the multiple transaction log. The log will cover the entire gaming day.
 - 3) Patron Name–Patron’s full name if known or provided by the patron. If patron refuses to provide his/her name, include additional description to help identify person.
 - 4) Patron Description–If patron’s name is unknown, complete description of the patron, including sex, nationality, weight, height, hair color, and any other distinguishing features.
 - 5) Amount–Total cash transaction amount.
 - 6) Transaction Type–Transaction types for casino cages are as follows:
 - a) Cash Out–Cashing personal checks, travelers checks, credit card advance checks, etc.;
 - b) Chip Redemption–Redeeming gaming chips for cash. Include gaming location in comments column;
 - c) Deposit In–Safekeeping deposit;
 - d) Deposit Out–Withdrawing a safekeeping deposit; and
 - e) Other–Any other cash transaction payment of EGD jackpots, and exchanges of currency for currency.
 - 7) Time–Time of the transaction including AM/PM.
 - 8) Employee’s Signature and MGC License Number–Employee logging the transaction must sign the appropriate log entry and include their MGC license number.
 - 9) Comments–Additional information useful in identifying the patron or explaining the transaction.
 - 10) Page _____ of _____ –Page number and total pages of the log for the gaming day.

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- (F) Chip Inventory Ledger
 - 1) date of receipt, issuance and destruction
 - 2) number of each denomination of chips received, issued, or destroyed
 - 3) dollar amount of each denomination of value chips received, issued, or destroyed
 - 4) number and description of non-value chips received, issued, or destroyed
 - 5) required signatures
 - 6) identification of primary chips held in reserve with the word “reserve”
- (G) Safekeeping Deposit/Withdrawal
 - 1) preprinted number on all copies
 - 2) patron’s name and signature
 - 3) date of deposit/withdrawals
 - 4) amount of deposit/withdrawals (alpha and numeric)
 - 5) type of deposit/withdrawal
 - 6) reason for deposit
 - 7) required signatures
- (H) Daily Passenger Report
 - 1) date
 - 2) cruise times
 - 3) beginning and ending entrance meter readings
 - 4) beginning and ending exit meter readings
 - 5) time the meter readings were taken
 - 6) back to back passenger count (stayovers)
 - 7) total passenger count from meter readings (entrances/exits)
 - 8) total ticket count
 - 9) end of day manual count, if applicable
 - 10) calculated admission tax for the day
 - 11) required signatures
- (I) Duplicate Key Inventory Log
 - 1) date and time
 - 2) key name, which shall be identical to the key name on the sensitive key access list
 - 3) key number
 - 4) number of keys in beginning inventory
 - 5) number of keys added or removed
 - 6) number of keys in ending inventory
 - 7) reason for adding or removing keys
 - 8) required signatures of the two individuals accessing the box
 - 9) signature of employee receiving the key

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- (J) Tips and Gratuity Deposit
 - 1) date
 - 2) amount of chips by denomination
 - 3) total amount of all denominations
 - 4) required signatures
- (K) Temporary Bank Voucher
 - 1) date and time
 - 2) location of bank
 - 3) amount of funds issued
 - 4) signature of main bank cashier issuing the funds
 - 5) signature of individual receiving funds
 - 6) signature of individual returning funds
 - 7) signature of main bank cashier receiving returned funds
- (L) Duplication of CPSM Log
 - 1) date
 - 2) manufacturer
 - 3) program number
 - 4) personnel involved
 - 5) disposition of any permanently removed CPSM
- (M) EGD Drop Compartment Sweeps Log
 - 1) EGD number and location
 - 2) date and time
 - 3) signature of employee performing the sweep
 - 4) supervisor's signature
- (N) EGD Drop/Win Report
 - 1) gaming date
 - 2) total bill drop
 - 3) total coupon drop
 - 4) total ticket drop
 - 5) total jackpot payouts
 - 6) total CEP In
 - 7) total CEP Out
 - 8) total NCEP In
 - 9) total NCEP Out
 - 10) total drop by denomination
 - 11) total drop all denominations
 - 12) net win (loss) by denomination and total
 - 13) accounting representative's signature
- (O) EGD Entry Access Log (MEAL Book)
 - 1) EGD number and location
 - 2) date and time

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- 3) reason for entry
- 4) required signatures
- (P) EGD Hand-Paid Jackpot Form
 - 1) date and time
 - 2) EGD number, location and denomination
 - 3) amount of jackpot before taxes are withheld, both alpha and numeric (Alpha is optional if another unalterable method is used for evidencing the amount of the jackpot.)
 - 4) taxes withheld (federal and state)
 - 5) number of credits played
 - 6) game theme and outcome (e.g., reel symbols, card values and suits, scatter pay, etc.)
 - 7) amount paid to patron, both alpha and numeric (Alpha is optional if another unalterable method is used for evidencing the amount paid to patron.)
 - 8) signature of cashier
 - 9) signature of winning guest (only required when a manual procedure or override must be used)
 - 10) signature of the employee paying the jackpot
 - 11) signature of the employee verifying and witnessing the payout
 - 12) preprinted or computer generated sequential number
- (Q) EGD Hopper Fill Slip
 - 1) date and time
 - 2) EGD number, location and denomination
 - 3) amount of hopper fill (numeric only is authorized if produced by an automated system)
 - 4) required signatures
- (R) EGD Sweeps Log
 - 1) EGD number and location
 - 2) date and time
 - 3) signature of employee performing the sweep
 - 4) supervisor's signature
- (S) Even Exchange Slip
 - 1) date, time and locations (to and from)
 - 2) amounts to be exchanged by type
 - 3) amounts to be changed for
 - 4) required signatures
 - 5) total exchanged
- (T) Cage/Bank Variance Slip
 - 1) date and time
 - 2) location of bank

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- 3) amount of overage or shortage
- 4) required signatures
- (U) Ingress/Egress Logs (Count Room and Cages)
 - 1) date
 - 2) printed name
 - 3) time in and out
 - 4) reason for entry
 - 5) required signatures
- (V) Main Bank/Vault Accountability
 - 1) date and shift
 - 2) opening balance
 - 3) amount of each type of accountability transactions
 - 4) detail of the total main bank/vault inventory (currency, coin, chips, safekeeping deposits, unclaimed property account and etc.)
 - 5) total main bank/vault inventory
 - 6) overages and shortages
 - 7) closing balance
 - 8) required signatures
- (W) Master Gaming Report
 - 1) gaming date
 - 2) game and table number
 - 3) table opener
 - 4) total fill slips
 - 5) total credit slips
 - 6) table closer
 - 7) total drop per table
 - 8) overall totals by game
 - 9) total win/loss
 - 10) required signatures
- (X) Reserved
- (Y) RAM Clearing Slip
 - 1) date and time
 - 2) EGD number, location and credits played
 - 3) dollar value of all progressive jackpot meters displayed
 - 4) reason for RAM clear
 - 5) required signatures
- (Z) Returned Check Log
 - 1) name and address of the person who presented the check
 - 2) date of the check
 - 3) amount of the check
 - 4) check number

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- 5) date the licensee received notification from a financial institution that the check was not accepted
 - 6) date of entry on the returned check log
 - 7) date(s) and amount(s) of any payments received on the check after being returned by a financial institution
- (AA) Sensitive Key Log
- 1) date
 - 2) key number or ring number
 - 3) individual/automated key box issuing key
 - 4) individual receiving key
 - 5) time key signed out
 - 6) time key signed in
 - 7) individual returning key
 - 8) individual/automated key box receiving returned key
- (BB) Signature Card
- 1) hire date
 - 2) employee name
 - 3) MGC license number
 - 4) exemplar initials
 - 5) exemplar signature (minimum of first initial, and last name)
- (CC) Surveillance Incident Report
- 1) date and incident report number
 - 2) time and location of incident
 - 3) names and player account numbers of witnesses and subjects involved in the incident, if known
 - 4) detail narrative of incident
 - 5) identification of video tape covering the incident
 - 6) final disposition of the incident
 - 7) required signatures
- (DD) Surveillance Shift Log
- 1) date
 - 2) beginning time and ending time, name, location, etc. of important or unusual observations
 - 3) items such as, but not limited to, equipment malfunctions related to other logged events or activities, completed tapes, still photograph requests, etc.
 - 4) required signatures
- (EE) Surveillance Release Log
- 1) record ID, if applicable
 - 2) location recorded
 - 3) date and time period of recording(s)
 - 4) date and time of release

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- 5) receiving department/agency
- 6) name of individual authorizing the release
- 7) printed name and signature of individual receiving the recording
- 8) signature of individual releasing the recording
- (FF) Surveillance Recording Retention Log
 - 1) date and time of log entry
 - 2) date and time period of recording
 - 3) tape number, if applicable
 - 4) location recorded
 - 5) description of the activity recorded
 - 6) reason for retention
 - 7) name and MGC license number of surveillance agent
- (GG) Table Credit Slip
 - 1) date, pit, game/table number and time
 - 2) amount of each denomination of chips to be credited
 - 3) total amount of all denomination to be credited
 - 4) required signatures
- (HH) Table Fill Slip
 - 1) date, pit, game/table number and time
 - 2) amount of each denomination of chips to be distributed
 - 3) total amount of all denomination to be distributed
 - 4) required signatures
- (II) Table Inventory Slip
 - 1) date and shift
 - 2) game and table number
 - 3) total value of each denomination of chips remaining at the table
 - 4) total value of all denominations
 - 5) signature of dealer closing the table
 - 6) signature of table games supervisor closing the table
 - 7) signature of dealer opening the table
 - 8) signature of table games supervisor opening the table
- (JJ) Table Soft Count Slip/Currency Counter Machine Tape
 - 1) date
 - 2) table game and number
 - 3) box contents by denomination
 - 4) total of all denominations
 - 5) required signatures
- (KK) Token Inventory Ledger
 - 1) date of receipt, count, issuance and destruction
 - 2) total number by denomination and dollar value received, issued or destroyed

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- 3) total of all denomination received, issued, or destroyed
- 4) required signatures
- (LL) Replacement Deck Log
 - 1) date and time each card is removed
 - 2) reason for replacement
 - 3) color, value, and suit value of the removed card(s)
 - 4) name and MGC number of individual who replaced the card(s)
 - 5) security officer's signature
- (MM) Surveillance Ingress/Egress Log
 - 1) date
 - 2) printed name
 - 3) time in and time out
 - 4) reason for entry
 - 5) signature of person entering
 - 6) name of the MGC agent authorizing entry
- (NN) Audit Exception Report
 - 1) date of exception report
 - 2) date of incident
 - 3) individual(s) involved in the exception
 - 4) brief explanation of the exception
 - 5) signature of the employee preparing the report
 - 6) department the exception report was issued to
 - 7) supervisor signature from department receiving the exception
 - 8) signature of employee responsible for the exception, if known
 - 9) date the report was returned to Accounting
- (OO) Security Incident Report
 - 1) Incident report number
 - 2) date and time
 - 3) location of incident
 - 4) date and time of incident
 - 5) type of incident
 - 6) names and addresses of witnesses and subjects involved in the incident, if known
 - 7) detail narrative of incident
 - 8) identification of video tape covering the incident, if applicable
 - 9) security officer's signature
- (PP) Security Incident Log
 - 1) date of daily log
 - 2) time of incident
 - 3) incident report number
 - 4) name of reporting security officer and MGC license number

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- 5) summary of incident
- (QQ) Visitor/Vendor Log
 - 1) date
 - 2) visitor's/vendor's printed name
 - 3) company, if applicable
 - 4) time in and out
 - 5) type of badge and badge number
 - 6) purpose of visit
 - 7) visitor's/vendor's signature
 - 8) security officer's signature
- (RR) Key Access List
 - 1) key ring number, if applicable
 - 2) key identifier/stamp on the key (must be unique for each key name)
 - 3) name of the key
 - 4) location of the key
 - 5) custodian of the key
 - 6) quantity of the key(s)
 - 7) job titles authorized to sign out the key and, if applicable, escort requirements and specific limitations
- (SS) Table Games Variance Slip
 - 1) gaming date
 - 2) game/table number
 - 3) shift
 - 4) description of discrepancy found
 - 5) required signatures
- (TT) Inventory Log of Pre-Numbered Forms
 - 1) name of pre-numbered form
 - 2) date received or issued
 - 3) number sequence of forms received or issued
 - 4) name of department that forms were issued to
 - 5) required signatures and MGC license numbers
- (UU) Gift Log
 - 1) name of the gift recipient
 - 2) name and business name of the gift donor
 - 3) description and value of the gift
 - 4) date the gift was received
- (VV) Safekeeping Log
 - 1) date of deposit or withdrawal
 - 2) name of patron
 - 3) dollar amount of deposit or withdrawal
 - 4) type of deposit/withdrawal

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- 5) total balance of all deposits
- (WW) Card/Dice Discrepancy Report
 - 1) date and time
 - 2) location
 - 3) description of discrepancy found
 - 4) required signatures
- (XX) Remote Access Log
 - 1) name and MGC number of the licensee’s employee authorizing access
 - 2) name and MGC number of vendor employee accessing the system
 - 3) name of user account that vendor used
 - 4) name of vendor
 - 5) name of system(s) accessed by the vendor
 - 6) description of all work performed
 - 7) date and time
 - 8) duration of access
- (YY) Reserved
- (ZZ) Redemption Log
 - 1) date
 - 2) dollar value of each item received by mail
 - 3) check number
 - 4) patron’s name and address
 - 5) signature of employee performing the transaction
- (AAA) Currency Cassette Log
 - 1) date
 - 2) time
 - 3) the tamper resistant seal number
 - 4) the unique cassette number
 - 5) amount of cash in the cassette
 - 6) denomination of currency in the cassette
 - 7) signature of the main bank cashier who prepared the cassette
- (BBB) Table Games Jackpot Slip
 - 1) date
 - 2) time
 - 3) amount of winnings before taxes (alpha and numeric) (Alpha is optional if another unalterable method is used for evidencing the amount of the winnings before taxes.)
 - 4) amount wagered and the odds of the bet at the time of the wager
 - 5) taxes withheld (federal and state)
 - 6) table game number
 - 7) type of jackpot
 - 8) player’s name

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- 9) amount paid to patron (alpha and numeric) (Alpha is optional if another unalterable method is used for evidencing the amount paid to patron.)
 - 10) signature of cashier
 - 11) signature of the Dealer
 - 12) signature of the Table Games Supervisor
 - 13) signature of the Security Officer escorting the funds
- (CCC) Meter Reading Comparison Report
- 1) date of report
 - 2) asset number
 - 3) dates the readings were taken
 - 4) beginning and ending credits played (soft and accounting system meters)
 - 5) beginning and ending credits paid (soft and accounting system meters)
 - 6) beginning and ending amount-to-drop (soft and accounting system meters) if applicable
 - 7) beginning and ending jackpots paid (soft and accounting system meters)
 - 8) difference between the beginning and ending amount for all meters
 - 9) variance between the meters, if any
 - 10) accounting Signature
- (DDD) Duplicate Sensitive Key Access List
- 1) name of key, which shall be identical to the key name on the sensitive key access list
 - 2) key number
 - 3) key identifier/stamp on the key (must be unique for each key name)
 - 4) the job titles authorized to sign out the key and, if applicable, escort requirements
- (EEE) Card Inspection Log (including Poker)
- 1) date and time
 - 2) detailed inspection procedures performed
 - 3) list of tables from which the cards were removed
 - 4) results of the inspection
 - 5) signature(s) of the individual(s) completing the inspection
- (FFF) Wire Transfer Form
- 1) date and time of request
 - 2) the patron's name
 - 3) patron's address
 - 4) patron's date of birth
 - 5) patron's social security number
 - 6) the identification type, number and expiration
 - 7) the anticipated date of patron's arrival
 - 8) amount of transfer (alpha and numeric)
 - 9) name on the patron's bank account

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- 10) patron's financial institution
- 11) patron's bank account number
- 12) routing number
- 13) transaction number
- 14) Cage Supervisor's signature
- 15) Main Bank/Floating Employee Window Cashier's signature
- 16) date and time of confirmation
- 17) signature of the accounting representative confirming the wire transfer
- 18) patron's signature

(GGG) Wire Transfer Return Form

- 1) date and time of request
- 2) patron's name
- 3) patron's date of birth
- 4) the type, number and expiration of identification provided
- 5) amount of wire transfer (alpha and numeric)
- 6) bank fees
- 7) total amount wired out (alpha and numeric)
- 8) name on the patron's bank account
- 9) patron's bank account number
- 10) patron's financial institution
- 11) patron's routing number
- 12) date of wire transfer
- 13) transaction number
- 14) patron's signature
- 15) Main Bank /Floating Employee Window Cashier's signature
- 16) Cage Supervisor's signature
- 17) Staff Accountant's signature

(HHH) Bad Beat/ Special Hand Payout form.

- 1) a description of the cards that comprised the winning poker hand for that pot
- 2) a description of the cards that comprised the winning bad beat hand
- 3) the name of the patron who had the winning poker hand for that pot
- 4) the name of the patron who had the winning bad beat or special hand
- 5) the names of the other payees
- 6) the amount won by each payee
- 7) the time, date, and signature of the employee completing the form

(III) Funds Transfer Slip

- 1) amount of each denomination of currency and chips being transferred
- 2) grand total of all currency and chips being transferred
- 3) source bank
- 4) destination bank

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- 5) date
- 6) time
- 7) signature of issuing individual
- 8) signature of receiving individual
- 9) signature of security officer, if escorted

(JJJ) Cards and Dice Collection Log

- 1) date and time of collection
- 2) pit number
- 3) quantity of each style/color of decks and dice collected from each pit/poker room
- 4) signature of security officer collecting the decks or dice
- 5) signature of table games/poker supervisor relinquishing the decks or dice

(KKK) Tip Container Log

- 1) Poker Dealer name and MGC number
- 2) tip container number
- 3) date and time issued
- 4) Poker Dealer signature receiving tip container
- 5) Poker Supervisor signature issuing tip container
- 6) date and time returned
- 7) reason returned (i.e., break, end of shift, emergency)
- 8) Poker Dealer signature returning tip container
- 9) Poker Supervisor signature receiving tip container

(LLL) Unclaimed Property Log

- 1) opening balance of the unclaimed property
- 2) dollar amount of the transactions that have occurred during the shift
- 3) total dollar amount of the transactions
- 4) ending balance

(MMM) Floating Employee Window Accountability Form

- 1) date and shift
- 2) opening balance
- 3) amount of each type of accountability transactions
- 4) detail of the total floating employee window inventory (currency, coin, chips, safekeeping deposits, unclaimed property account, etc.)
- 5) total floating employee window inventory
- 6) overages and shortages
- 7) closing balance
- 8) outgoing cashier's signature
- 9) incoming cashier's or verifier's signature

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