

BAD RIVER BAND OF LAKE SUPERIOR TRIBE OF CHIPPEWA INDIANS

CHIEF BLACKBIRD CENTER

P.O.Box 39 • Odanah, Wisconsin 54861

RESOLUTION NO. 11-18-10-318

Approving Internal Control Standards Section 560.10.7 Minimum Internal Control Standards for Card Games

WHEREAS: the Bad River Band of the Lake Superior Tribe of Chippewa Indians is a federally recognized Indian tribe with a Constitution enacted pursuant to the Indian Reorganization Act of 1934, 25 U.S.C. Section 476; and

WHEREAS: Article VI, Section 1(m) of the Bad River Constitution authorizes the Bad River Tribal Council to adopt resolutions regulating the procedures of Tribal agencies and Tribal officials, including the proper operation and conduct of the Band's gaming operations; and

WHEREAS: Federal regulations at 25 C.F.R. Part 542 provide that the Tribal gaming operation comply with such standards and procedures by developing suitable Internal Control Standards to protect Tribal assets, the interests of Tribal members, and the gaming public; and

WHEREAS: the Gaming Facility has prepared the Tribe's Internal Control Standards Section 560.10.7 to include the following:

SECTION 560.10.7 Minimum Internal Control Standards for Card Games as incorporated into this Resolution and attached hereto as Exhibit "A."

NOW, THEREFORE, BE IT RESOLVED that the Bad River Tribal Council hereby approves Section 560.10.7 Minimum Internal Control Standards for Card Games.

CERTIFICATION

I, the undersigned, as Secretary of the Bad River Band of the Lake Superior Tribe of Chippewa Indians, an Indian Tribe organized under Section 16 of the Indian Reorganization Act, hereby certify that the Tribal Council is composed of seven members, of whom 7 members, constituting a quorum, were present at a meeting hereof duly called, noticed, convened, and held on the 18 day of November, 2010; that the foregoing resolution was duly adopted at said meeting by an affirmative

vote of 6 members; 0 against; and 0 abstaining, and that the said resolution has not been rescinded or amended.

Loretta Ford

Loretta Ford, Secretary
Bad River Tribal Council

Resolution No. 11-18-10-318
Approving Internal Control Standards Section 560.10.7 Minimum Internal Control Standards for Card Games

SECTION 560.10.7

MINIMUM INTERNAL CONTROL STANDARDS FOR CARD GAMES

(a) Computer applications. For any computer applications utilized, alternate documentation and/or procedures that provide at least the level of control described by the standards in this section, as approved by the Tribal gaming regulatory authority, will be acceptable. (b) Standards for drop and count. The procedures for the collection of the card game drop and the count thereof shall comply with §§ 542.21, §§ 542.31, or §§ 542.41 (as applicable). (c) Standards for supervision. (1) Supervision shall be provided at all times the card room is in operation by personnel with authority equal to or greater than those being supervised. (2) Exchanges between table banks and the main card room bank (or cage, if a main card room bank is not used) in excess of \$ 100.00 shall be authorized by a supervisor. All exchanges shall be evidenced by the use of a lammer unless the exchange of chips, tokens, and/or cash takes place at the table. (3) Exchanges from the main card room bank (or cage, if a main card room bank is not used) to the table banks shall be verified by the card room dealer and the runner. (4) If applicable, transfers between the main card room bank and the cage shall be properly authorized and documented. (5) A rake collected or ante placed shall be done in accordance with the posted rules. (d) Standards for playing cards. (1) Playing cards shall be maintained in a secure location to prevent unauthorized access and to reduce the possibility of tampering. (2) Used cards shall be maintained in a secure location until marked, scored, or destroyed, in a manner approved by the Tribal gaming regulatory authority, to prevent unauthorized access and reduce the possibility of tampering. (3) The Tribal gaming regulatory authority, or the gaming operation as approved by the Tribal gaming regulatory authority, shall establish and the gaming operation shall comply with a reasonable time period, which shall not exceed seven (7) days, within which to mark, cancel, or destroy cards from play. (i) This standard shall not apply where playing cards are retained for an investigation. (ii) [Reserved] (4) A card control log shall be maintained that documents when cards and dice are received on site, distributed to and returned from tables and

Adopted Pursuant to TC Resolution 02-02-00-383
Amended by TC Resolution 2-22-01-41
Amended by TC Resolution 01-22-03-30
Amended by TC Resolution 11-29-07-191

Amended by TC Resolution 08-28-03-131
Amended by TC Resolution 04-14- 04-235
Amended by TC Resolution 04-21-04-239

(j) notice of malfunctioned camera.

removed from play by the gaming operation.

(e) Plastic cards. Notwithstanding paragraph (d) of this section, if a gaming operation uses plastic cards (not plastic-coated cards), the cards may be used for up to three (3) months if the plastic cards are routinely inspected, and washed or cleaned in a manner and time frame approved by the Tribal gaming regulatory authority. (f) Standards for shill. (1) Issuance of shill funds shall have the written approval of the supervisor. (2) Shill returns shall be recorded and verified on the shill sign-out form. (3) The replenishment of shill funds shall be documented. (g) Standards for reconciliation of card room bank. (1) The amount of the main card room bank shall be counted, recorded, and reconciled on at least a per shift basis. (2) At least once per shift, the table banks that were opened during that shift shall be counted, recorded, and reconciled by a dealer or other person, and a supervisor, and shall be attested to by their signatures on the check-out form. (h) Standards for promotional progressive pots and pools. (1) All funds contributed by players into the pools shall be returned when won in accordance with the posted rules with no commission or administrative fee withheld. (2) Rules governing promotional pools shall be conspicuously posted and designate: (i) The amount of funds to be contributed from each pot; (ii) What type of hand it takes to win the pool (e.g., what constitutes a "bad beat"); (iii) How the promotional funds will be paid out; (iv) How/when the contributed funds are added to the jackpots; and (v) Amount/percentage of funds allocated to primary and secondary jackpots, if applicable. (3) Promotional pool contributions shall not be placed in or near the rake circle, in the drop box, or commingled with gaming revenue from card games or any other gambling game. (4) The amount of the jackpot shall be conspicuously displayed in the card room. (5) At least once a day, the posted pool amount shall be updated to reflect the current pool amount. (6) At least once a day, increases to the posted pool amount shall be reconciled to the cash previously counted or received by the cage by personnel independent of the card room. (7) All decreases to the pool must be properly documented, including a reason for the decrease. (i) Promotional progressive pots and pools where funds are displayed in the card room. (1) Promotional funds displayed in the card room shall be placed in a locked container in plain view of the public. (ii) The posted pool amount shall then be updated to reflect the current pool

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amount.

SECTION 560.10.8

MINIMUM INTERNAL CONTROL STANDARDS FOR TABLE GAMES

1. (a) Computer applications.

For any computer applications utilized, alternate documentation and/or procedures that provide at least the level of control described by the standards in this section, as approved by the Tribal gaming regulatory authority, will be acceptable.

(b) Standards for drop and count.

The procedures for the collection of the table game drop and the count thereof shall comply with Sec. 542.21, Sec. 542.31, or Sec. 542.41 (as applicable).

(c) Fill and credit standards.

(1) Fill slips and credit slips shall be in at least triplicate form, and in a continuous, prenumbered series. Such slips shall be concurrently numbered in a form utilizing the alphabet and only in one series at a time. The alphabet need not be used if the numerical series is not repeated during the business year.

(2) Unissued and issued fill/credit slips shall be safeguarded and adequate procedures shall be employed in their distribution, use, and control. Personnel from the cashier or pit departments shall have no access to the secured (control) copies of the fill/credit slips.

(3) When a fill/credit slip is voided, the cashier shall clearly mark "void" across the face of the original and first copy, the cashier and one other person independent of the transactions shall sign both the original and first copy, and shall submit them to the accounting department for retention and accountability.

(4) Fill transactions shall be authorized by pit supervisory personnel before the issuance of fill slips and transfer of chips, tokens, or cash equivalents. The fill request shall be communicated to the cage where the fill slip is prepared.

(5) At least three parts of each fill slip shall be utilized as follows:

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