

SECTION 8 – TABLE GAMES

8.1 General Table Games Standards.

- A. *Supervision.* Pit supervisory personnel (with authority equal to or greater than those being supervised) shall provide supervision of all table games. Supervision must be provided as needed during table game operations by an agent(s) with authority equal to or greater than those being supervised.
 1. A supervisor may function as a dealer without any other supervision if disputes are resolved by supervisory personnel independent of the transaction or independent of the table games department; or,
 2. A dealer may function as a supervisor if not dealing the game.

8.2 Fill and Credit Standards.

- A. Fill slips and credit slips shall be in at least triplicate form, and in a continuous, pre-numbered 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.
- B. 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.
- C. 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 transaction shall sign both the original and first copy, and shall submit them to the accounting department for retention and accountability.
- D. 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.
- E. At least three parts of each Fill slip shall be utilized as follows:
 1. One part shall be transported to the pit with the fill and, after the appropriate signatures are obtained, deposited in the table game drop box;
 2. One part shall be retained in the cage for reconciliation of the cashier bank; and,
 3. For computer systems, one part shall be retained in a secure manner to ensure that only authorized persons may gain access to it. For manual systems, one part shall be retained in a secure manner in a continuous unbroken form.
- F. For Tier C gaming operations, the part of the Fill slip that is placed in the table game drop box shall

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be of a different color for fills than for credits, unless the type of transaction is clearly distinguishable in another manner (the checking of a box on the form shall not be a clearly distinguishable indicator).

G. The table number, shift, and amount of fill by denomination and in total shall be noted on all copies of the fill slip. The correct date and time shall be indicated on at least two copies.

H. All fills shall be carried from the cashier's cage by a person who is independent of the cage or pit.

I. The fill slip shall be signed by at least the following persons (as an indication that each has counted the amount of the fill and the amount agrees with the fill slip):

1. Cashier who prepared the fill slip and issued the chips, tokens, or cash equivalent;
2. Runner who carried the chips, tokens, or cash equivalents from the cage to the pit;
3. Dealer or boxperson who received the chips, tokens, or cash equivalents at the gaming table; and,
4. Pit supervisory personnel who supervised the fill transaction; and,

J. Fills shall be broken down and verified by the dealer or boxperson in public view before the dealer or boxperson places the fill in the table tray.

K. A copy of the Fill slip shall then be deposited into the table game drop box by the dealer, where it shall appear in the soft count room with the cash receipts for the shift.

L. Table credit transactions shall be authorized by a pit supervisor before the issuance of credit slips and transfer of chips, tokens, or other cash equivalent. The credit request shall be communicated to the cage where the credit slip is prepared.

M. At least three parts of each Credit slip shall be utilized as follows:

1. Two parts of the credit slip shall be transported by the runner to the pit. After signatures of the runner, dealer, and pit supervisor are obtained, one copy shall be deposited in the table game drop box and the original shall accompany transport of the chips, tokens, markers, or cash equivalents from the pit to the cage for verification and signature of the cashier.
2. For computer systems, one part shall be retained in a secure manner to ensure that only authorized persons may gain access to it. For manual systems, one part shall be retained in a secure manner in a continuous unbroken form.

N. The table number, shift, and the amount of credit by denomination and in total shall be noted on all copies of the credit slip. The correct date and time shall be indicated on at least two copies.

O. Chips, tokens, and/or cash equivalents shall be removed from the table tray by the dealer or boxperson and shall be broken down and verified by the dealer or boxperson in public view prior to placing them in racks for transfer to the cage.

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P. All chips, tokens, and cash equivalents removed from the tables and markers removed from the pit shall be carried to the cashier's cage by a person who is independent of the cage or pit.

Q. The credit slip shall be signed by at least the following persons (as an indication that each has counted or, in the case of markers, reviewed the items transferred):

1. Cashier who received the items transferred from the pit and prepared the Credit slip;
2. Runner who carried the items transferred from the pit to the cage;
3. Dealer who had custody of the items prior to transfer to the cage;
4. Pit supervisory personnel who supervised the credit transaction; and,
5. The Credit slip shall be inserted in the table game drop box by the dealer.

R. Chips, tokens, or other cash equivalents shall be deposited on or removed from gaming tables only when accompanied by the appropriate fill/credit or marker transfer forms.

S. Cross fills (the transfer of chips between table games) and even cash exchanges are prohibited in the pit.

8.3 Table Inventory Forms.

A. At the close of each shift, for those table banks that were opened during that shift:

1. The table's chip, token, coin, and marker inventory shall be counted and recorded on a table inventory form; or,
2. If the table banks are maintained on an imprest basis, a final fill or credit shall be made to bring the bank back to par.

B. If final fills are not made, beginning and ending inventories shall be recorded on the master game sheet for shift win calculation purposes.

C. The accuracy of inventory forms prepared at shift end shall be verified by the outgoing pit supervisor and the dealer. Alternatively, if the dealer is not available, such verification may be provided by another pit supervisor or another supervisor from another gaming department. Verifications shall be evidenced by signature on the inventory form.

D. If inventory forms are placed in the drop box, such action shall be performed by a person other than a pit supervisor.

8.4 Table Game Computer Generated Documentation Standards.

A. The computer system shall be capable of generating adequate documentation of all information

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recorded on the source documents and transaction detail (e.g., fill/credit slips, markers, etc.).

B. This documentation shall be restricted to authorized personnel.

C. The documentation shall include, at a minimum:

1. System exception information (e.g., appropriate system parameter information, corrections, voids, etc.); and,

2. Personnel access listing, which includes, at a minimum:

a. Employee name or employee identification number (if applicable); and,

b. Listing of functions employees can perform or equivalent means of identifying the same.

8.5 Standards for Playing Instruments.

A. The following standards shall apply to playing cards and dice:

1. Both used and unused playing cards and dice shall be maintained in a secure location to prevent unauthorized access and reduce the possibility of tampering.

2. Used cards and dice shall be marked immediately following removal from play then maintained in a secure location until “scored” or “destroyed” to prevent unauthorized access and reduce the possibility of tampering. A destruction method shall be approved by the CNGC.

3. The CNGC, or the gaming operation as approved by the CNGC, shall establish and the operation shall comply with a reasonable time period, which shall not exceed seven (7) days, within which to mark, cancel or destroy cards and dice from play. This standard shall not apply where playing cards or dice are retained for an investigation.

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 removed from the gaming operation.

5. Notwithstanding paragraph (A) (3) of this section, if a gaming operation uses plastic cards (not plastic-coated cards), the cards may be used for up to three months if the plastic cards are routinely inspected, and washed or cleaned in a manner and time frame approved by the CNGC.

B. Chip(s) and token(s). Controls must be established and procedures implemented to ensure accountability of chip and token inventory. Such controls must include, but are not limited to, the following:

1. Purchase;

2. Receipt;

3. Inventory;

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4. Storage; and,
5. Destruction.

8.6 Analysis of Table Game Performance.

- A. Records shall be maintained by day and shift indicating any single-deck blackjack games that were dealt for an entire shift. Records reflecting hold percentage by table and type of game shall be maintained by shift, by day, cumulative month-to-date, and cumulative year-to-date.
- B. This information shall be presented to and reviewed by management independent of the pit department on at least a monthly basis.
- C. The management in Section 8.6 (B) shall investigate any unusual fluctuations in hold percentage with pit supervisory personnel.
- D. The results of such investigations shall be documented, maintained for inspection, and provided to the CNGC upon request.

8.7 Accounting and Auditing Standards.

- A. The accounting and auditing procedures shall be performed by personnel who are independent of the transactions being audited/accounted for.
- B. If a table game has the capability to determine drop (e.g., bill-in drop meters, bill acceptor, computerized record, etc.) the dollar amount of the drop shall be reconciled to the actual drop by shift.
- C. Accounting/auditing employees shall review exception reports for all computerized table games systems at least monthly for propriety of transactions and unusual occurrences.
- D. All noted improper transactions or unusual occurrences shall be investigated with the results documented.
- E. Evidence of table games auditing procedures and any follow-up performed shall be documented, maintained for inspection, and provided to CNGC upon request.
- F. A daily recap shall be prepared for the day and month-to-date, which shall include the following information:
 1. Drop;
 2. Win (Player pool); and,
 3. Gross Revenue.

8.8 Other Standards.

- A. Points awarded for qualifying games shall adhere to the standards in Section 17 – Player Tracking System, as applicable.
- B. The procedures for the collection of the table game drop and the count thereof shall comply with Section 12 – Drop and Count, as applicable to the tier level of operation.

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22.1 Definitions.

Definitions used in previous and subsequent sections retain their meaning unless modified below:

Surveillance Room – a secure location(s) in a gaming operation used primarily for casino surveillance.

Surveillance System – a system of video cameras, monitors, recorders, video printers, switches, selectors, and other ancillary equipment used for casino surveillance.

22.2 General.

A. Surveillance Staffing.

1. Tier A gaming operations must, at a minimum, maintain and operate an unstaffed surveillance system in a secured location whereby the areas under surveillance are continually recorded.
2. For Tier B and C, the surveillance system shall be maintained and operated from a staffed surveillance room and shall provide surveillance over gaming areas.
3. Supervision. Supervision must be provided as needed for surveillance by an agent(s) with authority equal to or greater than those being supervised.

B. Location.

The entrance to the surveillance room shall be located so that it is not readily accessible by either gaming operation employees who work primarily on the casino floor, or the general public.

C. Access.

Access to the secured room or surveillance room, as appropriate, shall be limited to surveillance personnel, designated employees, and other persons authorized in accordance with the surveillance department policy. Such policy shall be approved by the CNGC. The surveillance department shall maintain a sign-in log of other authorized persons entering the surveillance room. Such policy shall be approved by the CNGC. The surveillance department shall maintain a sign-in log of other authorized persons entering the surveillance room.

D. Training.

The surveillance department shall strive to ensure staff is trained in the use of the equipment, knowledge of the games, and house rules.

E. Reporting.

CNGC-approved procedures must be implemented for reporting suspected crimes and suspicious activities.

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22.3 Equipment.

A. For Tier A, controls must be established and procedures implemented that include the following equipment standards:

1. The surveillance system must be maintained and operated from a secured location, such as a locked cabinet. The surveillance system shall include date and time generators that possess the capability to accurately record and display the date and time of recorded events on video and/or digital recordings. The displayed date and time shall not significantly obstruct the recorded view.
2. Each camera required by the standards in this Section shall be installed in a manner that will prevent it from being readily obstructed, tampered with, or disabled by patrons or staff.
3. Each camera required by the standards in this Section shall possess the capability of having its picture recorded. The surveillance system shall include sufficient numbers of recorders to simultaneously record multiple gaming and count room activities, and record the views of all dedicated cameras and motion activated dedicated cameras.
4. The Surveillance room equipment shall have total override capability over all other satellite surveillance equipment located outside the surveillance operation room.
5. In the event of power loss to the surveillance system, alternative security procedures, such as additional supervisory/managerial or security personnel, must be implemented immediately.
6. The surveillance system must have the capability to display all camera views on a monitor.

B. For Tier B and C – in addition to Tier A standards listed above, the following shall apply:

1. The surveillance system must be maintained and operated from a staffed surveillance operation room(s). The surveillance system shall include sufficient numbers of monitors to simultaneously display gaming and count room activities.
2. In the event of power loss to the surveillance system, an auxiliary or backup power source shall be available and capable of providing immediate restoration of power to all elements of the surveillance system that enable Surveillance personnel to observe the table games remaining open for play and all areas covered by dedicated cameras. For Tier C, auxiliary or backup power sources such as a UPS System, backup generator, or an alternate utility supplier, will satisfy this requirement.

22.4 Surveillance Activity Logs.

A. Logs must be maintained and demonstrate the following:

1. Compliance with the storage, identification, and retention standards required in this section;

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2. Each malfunction and repair of the surveillance system as defined in this section; and
3. Activities performed by surveillance agents as required by the controls in this section.

B. For Tiers B and C, Surveillance personnel shall maintain a log of all surveillance activities. Such log shall be maintained by Surveillance operation room personnel and shall be stored securely within the Surveillance department. At a minimum, the following information shall be recorded in a surveillance log:

1. Date;
2. Time commenced and terminated;
3. Activity observed or performed; and,
4. The name or license credential number of each person who initiates, performs, or supervises the surveillance.

C. Surveillance personnel shall also record a summary of the results of the surveillance of any suspicious activity. This summary may be maintained in a separate log.

D. Surveillance logs shall be maintained by the gaming operation and made available for inspection by the SCA for no less than three (3) years from the date generated. Surveillance logs may, at the discretion of the gaming operation, be destroyed if no incident has been reported within one (1) year following the date such records were made. Records shall include video tapes and any other storage media.

22.5 Malfunction and Repair.

A. Malfunction and Repair Log.

1. Surveillance personnel shall maintain a log or alternative procedure approved by the CNGC that documents each malfunction and repair of the surveillance system as defined in this Section.
2. The log shall state the time, date, and nature of each malfunction, the efforts expended to repair the malfunction, and the date of each effort, the reasons for any delays in repairing the malfunction, the date the malfunction is repaired, and where applicable, any alternative security measures that were taken.

B. In the event of a dedicated camera malfunction, the operation and/or the Surveillance department shall immediately, upon identification of the malfunction, provide alternative camera coverage or other security measures, such as additional supervisory or security personnel, to protect the subject activity.

C. A periodic inspection of the surveillance systems must be conducted. When a malfunction of the surveillance system is discovered, the malfunction and necessary repairs must be documented and repairs initiated within seventy two (72) hours. The CNGC shall be notified of any camera(s) that

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has malfunctioned for more than twenty-four (24) hours and the alternative security measures being implemented.

22.6 Video/Digital Records and Retention.

- A. All video recordings and/or digital records of coverage provided by the dedicated cameras or motion-activated dedicated cameras required by the standards in this section shall be retained for a minimum of seven (7) days.
- B. A video library log, or comparable alternative procedure approved by the CNGC, shall be maintained to demonstrate compliance with the storage, identification, and retention standards required in this Section.
- C. Recordings involving suspected or confirmed gaming crimes, unlawful activity, or detentions by security personnel, must be copied and retained for a time period, not less than one year.
- D. Duly authenticated copies of video recordings and/or digital records shall be provided to the CNGC upon request.

22.7 Bingo.

- A. For manual draws, the surveillance system must monitor the bingo ball drawing device or mechanical random number generator, which must be recorded during the course of the draw by a dedicated camera to identify the numbers or other designations drawn.
- B. The surveillance system shall possess the capability to monitor the bingo ball drawing device or random number generator, which shall be recorded during the course of the drawing by a dedicated camera with sufficient clarity to identify the balls drawn or numbers selected.
- C. The surveillance system shall monitor and record the game board and the activities of the employees responsible for drawing, calling, and entering the balls drawn or numbers selected.

22.8 Gaming Machines.

- A. Except as otherwise provided in paragraphs 22.8(B) and (C) of this Section, gaming machines offering a payout of more than \$250,000 shall be monitored and recorded by a dedicated camera(s) to provide coverage of:
 - 1. All customers and employees at the gaming machine; and,
 - 2. The face of the gaming machine, with sufficient clarity to identify the payout line(s) of the gaming machine.
- B. In-house progressive gaming machines offering a base payout amount (jackpot reset amount) of more than One Hundred Thousand Dollars (\$100,000.00) shall be recorded by a dedicated camera(s) to provide coverage of:
 - 1. All guests and employees at the gaming machine; and,

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2. The face of the gaming machine, with sufficient clarity to identify the payout line(s) of the gaming machine.

C. Wide-area progressive:

1. Wide-area progressive gaming machines offering a base payout amount of One Million Dollars (\$1,000,000.00) or more and monitored by an independent vendor utilizing an on-line progressive computer system shall be recorded by a dedicated camera(s) to provide coverage of:
 - a. All customers and employees at the gaming machine; and,
 - b. The face of the gaming machine, with sufficient clarity to identify the payout line(s) of the gaming machine.

D. Notwithstanding paragraph 22.8(A) of this Section, if the gaming machine is a progressive or multi-game machine, the CNGC, or the operations subject to the approval of the CNGC, may develop and implement alternative procedures to verify payouts.

22.9 Table Games.

A. Except as otherwise provided in Section 22.11 below, the surveillance system of gaming operations operating four (4) or more table games shall provide at a minimum one (1) pan-tilt-zoom camera per two (2) tables and surveillance must be capable of taping:

1. With sufficient clarity to identify customers and dealers; and,
2. With sufficient coverage and clarity to simultaneously view the table bank and determine the configuration of wagers, card values, and game outcome.

B. One (1) dedicated camera per table and one (1) PTZ camera per four (4) tables may be an acceptable alternative procedure to satisfy the requirements of subsection (A) in this standard.

C. The surveillance system of operations operating three (3) or fewer table games shall:

1. Comply with the requirements of paragraph 23.12(A) of this Section; or
2. Have one (1) overhead camera at each table.

D. Progressive table games with a guaranteed base jackpot of Twenty-five Thousand Dollars (\$25,000.00) or more shall be recorded and monitored by dedicated cameras that provide coverage of the following:

1. The table surface sufficient that the card values and card suits can be clearly identified.

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2. An overall view of the entire table with sufficient clarity to identify customers and dealers.
3. A view of the progressive meter jackpot amount. If several tables are linked to the same progressive jackpot meter, only one (1) meter need be recorded.

22.10 Card Games.

- A. Progressive card games with a progressive jackpot of \$25,000 or more shall be monitored and recorded by dedicated cameras that provide coverage of:
 1. The table surface, sufficient that the card values and card suits can be clearly identified;
 2. An overall view of the entire table with sufficient clarity to identify customers and dealer; and,
 3. A view of the posted jackpot amount.
- B. Except for card game tournaments, a dedicated camera(s) with sufficient clarity must be used to provide:
 1. An overview of the activities on each card table surface, including card faces and cash and/or cash equivalents;
 2. An overview of card game activities, including patrons and dealers; and,
 3. An unobstructed view of all posted progressive pool amounts.
- C. The surveillance system shall record the general activities in each card room and be capable of identifying the employees performing the different functions. For Tiers B and C only, the surveillance system shall monitor and record general activities in each card room with sufficient clarity to identify the employees performing the different functions.

22.11 Craps/Roulette/Big Wheel.

- A. All craps tables shall have two (2) dedicated cross view cameras covering both ends of the table.
- B. All roulette areas shall have one (1) overhead dedicated camera covering the roulette wheel and shall also have one (1) dedicated camera covering the play of the table.
- C. All big wheel games shall have one (1) dedicated camera viewing the wheel.

22.12 Tournaments.

For card game tournaments, a dedicated camera(s) must be used to provide an overview of tournament activities, and any area where cash or cash equivalents are exchanged.

22.13 Pari-Mutuel Wagering.

For Tiers B and C only, the surveillance system shall monitor and record general activities occurring in the pari-mutuel area, to include the ticket writer/cashier and customers, with sufficient clarity to identify the employees performing the different functions.

22.14 Kiosks.

The surveillance system must monitor and record a general overview of activities occurring at each kiosk with sufficient clarity to identify the activity and the individuals performing it, including maintenance, drops or fills, and redemption of wagering vouchers or credits.

22.15 Main Cage/Vaults/Soft Count/Drop and Issue.

A. Cage/Vault/Soft Count.

1. The surveillance system shall monitor and record a general overview of activities occurring in each cage and vault area with sufficient clarity to identify employees within the cage and customers and employees at the counter areas, and to confirm the amount of each cash transaction.
2. Each cashier station shall be equipped with one (1) dedicated overhead camera covering the transaction area.
3. For Tiers B and C only, the surveillance system shall provide an overview of cash transactions. This overview should include the customer, the employee, and the surrounding area.
4. The cage or vault area in which exchange and transfer transactions occur must be monitored and recorded by a dedicated camera or motion activated dedicated camera that provides coverage with sufficient clarity to identify the chip values and the amounts on the exchange and transfer documentation. Controls provided by a computerized exchange and transfer system constitute an adequate alternative to viewing the amounts on the exchange and transfer documentation.

B. Fills and Credits.

1. The cage or vault area in which fills and credits are transacted shall be monitored and recorded by a dedicated camera or motion activated dedicated camera that provides

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coverage with sufficient clarity to identify the chip values and the amounts on the Fill and Credit slips.

2. Controls provided by a computerized fill and credit system may be deemed an adequate alternative to viewing the Fill and Credit slips.

C. Currency and Coin.

1. For Tier A, the surveillance system shall record a general overview of all areas where currency or coin may be stored or counted. For Tiers B and C only, the surveillance system shall monitor and record with sufficient clarity all areas where currency or coin may be stored or counted. For Tier C only, audio capability of the soft count room shall also be maintained.
2. For Tiers B and C only, the surveillance system shall provide for:
 - c. Coverage of currency counters shall be sufficiently clear to view any attempted manipulation of the recorded data.
 - d. Monitoring and recording of the table game drop box / financial instrument storage component storage rack or area by either a dedicated camera or a motion activated camera.
 - e. Monitoring and recording of soft count room, including all doors to the room, all table game drop box / financial instrument storage components, safes, and counting surfaces, and all count team personnel. The counting surface area must be continuously monitored and recorded by a dedicated camera during the soft count.
 - f. Monitoring and recording of all areas where currency is sorted, stacked, counted, verified, or stored during the soft count process.
 - g. Monitoring and recording of all areas where coin may be stored or counted, including the hard count room, all doors to the hard count room, all scales and wrapping machines, and all areas where uncounted coin may be stored during the drop and count process.
3. The surveillance system shall monitor and record a general overview of the activities occurring in each gaming machine cashiers station.



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CHEROKEE NATION GAMING COMMISSION

RULES AND REGULATIONS

CHAPTER:	Authorization of Gaming Activity	CHAPTER #:	VII
SUBJECT:	Craps & Mini-Craps	SECTION – SUBSECTION:	G
EFFECTIVE DATE:	2 August 2018	SUPERSEDES MATERIAL DATED:	
APPROVED BY:		DATE:	29 June 2018

Purpose

The purpose of this Chapter is to implement relevant provisions of the Indian Gaming Regulatory Act (IGRA) (25 U.S.C. § 2706, 2710 and 2712), the National Indian Gaming Commission (NIGC) regulations, the Cherokee Nation Code Annotated Title 4 (Gaming Ordinance), the Tribal-State Compact, and other applicable laws and regulations relating to the role and responsibility of Cherokee Nation Gaming Commission (CNGC) to regulate gaming systems, components, and devices within the jurisdiction of CNGC.

SCOPE

This Section shall cover the play of the game “Craps,” and any variations thereof, and any instruments used in connection therewith, as approved by the CNGC.

AUTHORITY

Title 4 § 22 CNCA

Tribal-State Compact Part 5 (A)

Tribal-State Compact Part 5 (G)

A. DEFINITIONS

1. *Enterprise* – The entity conducting gaming operations on behalf of or as authorized by the Cherokee Nation.
2. *Cherokee Nation Gaming Commission (CNGC)* – The regulatory body established by the Cherokee Nation to oversee and regulate the conduct of gaming on lands owned by the Cherokee Nation.
3. *Compact Game* – An electronic and/or card/table game authorized under the model compact and as described in O.S. Title 3A.

4. *State Compliance Agency (SCA)* – The agency charged with overseeing compact gaming on behalf of the State of Oklahoma; currently, the Office of Management and Enterprise Services.
5. *System of Internal Controls (SICS)* – An overall operational framework for a gaming operation that incorporates principles of independence and segregation of function, and is comprised of written policies, procedures and standard practices based on overarching regulatory standards specifically designed to create a system of checks and balances to safeguard the integrity of a gaming operation and protect its assets from unauthorized access, misappropriation, forgery, theft, or fraud.

B. GAME RULES AND PAYOUT ODDS

1. The Enterprise shall prepare and submit game rules, internal controls, and policies and procedures for the game of Craps, and any variations thereof, including Mini-Craps, to the CNGC for review and approval.
2. A proposed table games felt for Craps, Mini-Craps, or any variations thereof, that corresponds to the approved game rules for said game must be submitted to the CNGC for review and approval.
3. The Enterprise shall post the payout odds on the table felts and with the printed game play rules pamphlet for each game offered, which shall be kept in or near the pit.
4. The Enterprise, as approved by the CNGC, may charge a percentage, fee, or Vigorish to a player in making any wager in the game of Craps, Mini-Craps, or any other approved variation.
5. No changes to game rules, table games felts, or payout odds may be made without prior approval from the CNGC.

C. CRAPS AND MINI-CRAPS TABLES; PHYSICAL CHARACTERISTICS

1. A Craps table may be no shorter than 12 feet and no longer than 18 feet in length when measured from the inside rim of the table.
2. A Mini-Craps table may not be longer than 9½ feet in length and have seating locations for a maximum of nine (9) players.
3. The layout for Craps and Mini-Craps tables shall be submitted to the CNGC for review and approval and must contain, at a minimum:
 - a. The name or logo of the gaming facility in which the game is played;
 - b. Specific areas designated for the placement of wagers authorized in accordance with the game rules;

- c. Specific approval for variations to the game of "Craps" will be necessary prior to offering the game for play by the public.
4. Each Craps and Mini-Craps table must have a drop box and tip box affixed to the table in locations approved by the CNGC.

D. DICE – PHYSICAL CHARACTERISTICS

1. Except as otherwise approved by the CNGC, each die used in gaming shall:
 - a. Be formed in the shape of a perfect cube and of a size no smaller than .750 of an inch on each side nor any larger than 0.775 of an inch on each side with an acceptable tolerance of $+\/- .005$ (five ten-thousandths) inch, as measured by a micrometer;
 - b. Be transparent and made exclusively of cellulose except for the spots, name or trade name of the casino and serial numbers or letters contained thereon;
 - c. Have the surface of each of its sides perfectly flat and the spots contained in each side perfectly flush with the area surrounding them;
 - d. Have all edges and corners perfectly square and forming perfect 90-degree angles;
 - e. Have the texture and finish of each side exactly identical to the texture and finish of all other sides;
 - f. Have its weight equally distributed throughout the cube and no side of the cube heavier or lighter than any other side of the cube;
 - g. Have its six side bearing white circular spots from one to six respectively with the diameter of each spot equal to the diameter of every other spot on the die;
 - h. Have spots arranged so that the spots on opposite sides of the die will always add up to seven (7); each spot shall be placed on the die by drilling into the surface of the cube and filling the drilled out portion with a compound which is equal in weight to the weight of the cellulose drilled out and which forms a permanent bond with the cellulose cube;
 - i. Have imprinted or impressed thereon a serial number and the name or trade name of the casino licensee in which the die is being used.
2. In order to be considered for approval, gaming management must supply the following:
 - a. Written specifications for the proposed dice;

- b. The name and address of the manufacturer. Said manufacturer must be a licensed and bonded vendor prior to ordering;
 - c. Verification upon oath, notarized affirmation, executed by the chief operating officer of the manufacturer, or a person with equivalent responsibilities, that it has a written system of internal controls, which describes in detail the current administrative, accounting and security procedures which are utilized in the manufacture, storage, and shipment of the dice and any related materials. The written system of internal controls must include, at a minimum, a detailed narrative description of the procedures and controls implemented to insure the integrity and security of the manufacturing process, from design through shipment, including but not limited to those procedures and controls designed specifically to:
 - i. Provide for the secure storage or destruction of all pre-production prototypes, samples, production rejects and other products;
 - ii. Provide security over the items used in the manufacturing process;
 - iii. Prevent the unauthorized removal of product from the production facility through the utilization of security devices;
 - iv. Restrict access to raw materials, work in process, and finished goods inventories to authorized personnel.
 - v. Provide such other or additional information as the Commission may require during the licensing process.
- d. The Commission may in writing approve variations from the specific requirements of this regulation if, in the opinion of the Commission, the alternative controls and procedures meet the objectives of this regulation.

3. If, after receiving and reviewing the items and information described by this regulation, the Commission is satisfied that the proposed dice conform to the requirements of this regulation, the Commission shall notify the licensee or the manufacturer authorized by the licensee to produce the dice in writing and shall request, and the licensee or the manufacturer shall provide a sample of the proposed dice in final, manufactured form. If the Commission is satisfied that the sample conforms with the requirements of this regulation and the information submitted with the licensee's application, the Commission shall approve the proposed dice and notify the licensee in writing. The Commission may retain the sample dice submitted pursuant to this subsection.

4. Before new dice can be put into use in the casino they must be counted and inspected by management and witnessed and verified by a Gaming Commission representative. Copies of all order, shipping, and inventory documents must be provided to the Commission as they become available.

E. DICE – RECEIPT AND STORAGE

1. When boxes of dice are received for use in the casino from the licensed manufacturer or licensed distributor thereof, at least two (2) individuals, one of whom must be from the Security department and one from either the accounting or gaming department, shall inspect the dice shipment looking for evidence of tampering or damage. If no tampering or damage is apparent, a sample of dice packages must be inspected, using a sample methodology established by the Enterprise, as approved by the CNGC, to ensure compliance with the specifications as stated in section D(1) prior to accepting the shipment into inventory.
2. Gaming management shall maintain a log to account for dice in accordance with the procedures contained in the casino's SICS. The SICS shall require the following:
 - a. A dice inventory system, which shall include, at a minimum, the recordation of the following:
 - i. Balance of dice on hand and their location;
 - ii. Dice received from the vendor;
 - iii. Dice removed from storage;
 - iv. Dice returned from storage;
 - v. Date of:
 - a. Receipt from vendor;
 - b. Removal from storage;
 - c. Return to storage;
 - d. Physical inventory of dice;
 - vi. Signatures of the casino security and accounting and/or gaming department representatives participating in the transaction.

- b. All approved storage areas outside of the warehouse, including pit stands, used to store dice for more than one gaming day shall be capable of being locked. The table games department shall be responsible for the key; provided, however, Security shall maintain a master key.
 - c. When removing dice from the primary storage area, table games department management, in the presence of a security officer, shall remove the appropriate number of dice.
3. A physical inventory of all dice must be performed at least once per month.
 - a. The inventory must be performed by individuals with no incompatible functions and shall be verified to the balance of dice on hand as required in subsection (a) above.
 - b. Any discrepancies must be immediately reported to gaming management and the CNGC.

F. DICE – INSPECTION AND REMOVAL FROM USE

1. All envelopes and containers used in this section for dice pre-inspected at the pit stand or in a primary storage area and for those collected by the Security department must be transparent. The envelopes or containers and the method used to seal them shall be designed or constructed so that any tampering shall be evident.
2. All dice shall be inspected and distributed to the gaming tables in accordance with a method prescribed by the Enterprise, as approved by the CNGC; no changes to the inspection or distribution method may be made or implemented without prior written authorization from the CNGC.
3. The casino licensee shall remove any dice at any time of the gaming day if there is any indication of tampering, flaws, or other defects that might affect the integrity or fairness of the game or at the request of the CNGC.
4. The Dealer or Stickperson must notify the Boxperson and/or floor supervisor of any damaged, flawed, marked, or suspicious appearing dice, so that the supervisor can determine the appropriate course of action.
5. All extra dice in dice reserve that are to be destroyed or cancelled shall be placed in a sealed envelope or container, with a label attached to each envelope or container that identifies the date and time and is signed by the table games supervisor.
6. At the end of each gaming day or, in the alternative, at least once each gaming day at the same time each day, as designated by the casino licensee, and at such other times as may be necessary, the Pit Manager or designee shall collect and sign all envelopes or containers of used dice and any dice in dice reserve that are to be destroyed or cancelled and shall

transport them to the warehouse for cancellation or destruction. No dice that have been placed in a cup or shaker for use in gaming shall remain on a table for more than 24 hours.

7. At the end of each gaming day or, in the alternative, at least once each gaming day at the same time each day, as designated by the casino licensee and, and at such other times as may be necessary, a table games shift manager or table games supervisor thereof may collect all extra dice in dice reserve.
 - a. If collected, dice shall be returned to the primary storage area; provided, however, that any dice that have not been inspected and sealed pursuant to the requirements in sub-section 2(c) above (Alternative No. 3) shall, prior to use for actual gaming, be inspected in accordance with the requirements in sub-sections 2(a) or 2(b) above; and
 - b. If not collected, all dice in dice reserve must be re-inspected in accordance with sub-sections 2(a), 2(b), or 2(c) above, prior to their use for gaming, except for those dice maintained in a locked compartment pursuant to sub-section 2(b)(v)(i) or 2(c)(vi) above.

G. DICE – CANCELLATION AND DESTRUCTION

1. Other than dice retained for CNGC inspection, dice shall be cancelled or destroyed within 72-hours of collection by the Security department. In addition, once dice retained as evidence by the CNGC are released to the Security department, the dice shall be cancelled or destroyed within 24-hours.
2. The cancellation and destruction process and methods employed by the Enterprise must be approved by the CNGC.
3. Cancellation and destruction of dice shall take place under surveillance coverage in a secure place, the location of which must be approved by the CNGC.

H. INVALID ROLL OF THE DICE

1. The Enterprise shall prescribe the method, as approved by the CNGC, for determining the criteria and circumstances constituting a valid and invalid roll.
2. Any patron disputes of the outcome of a valid or invalid roll will be handled according to sub-section J of this document.

I. WAGERS

1. Allowable wagers must be included in the game rules, which must be approved by the CNGC. Any side wagers between players, players and the Dealer or Stickperson, or observers are prohibited.
2. Minimum and maximum wagers are to be posted in clear view at or on the table.

3. The Enterprise must provide a method for addressing tokes and toke wagers, which must receive approval by the CNGC, along with any subsequent modifications, prior to being implemented.

J. IRREGULARITIES

1. If a player or Dealer error occurs, the table games supervisor may offer the player, at the supervisor's discretion, remedies to correct the error so long as they are not in conflict with approved game rules, internal controls, or table games standard operating procedures.
2. Table games management has the authority to handle unspecified irregularities and disputes at their discretion; provided any decision made is in accordance with Enterprise dispute resolution procedures approved by the CNGC.
3. Table games management must notify the CNGC if any player is involved in suspicious activity or if any regulation violation is suspected or verified.



CHAPTER:	Authorization of Gaming Activity	CHAPTER #:	VII
SUBJECT:	Roulette	SECTION – SUBSECTION:	H
EFFECTIVE DATE:	08/02/2018	SUPERSEDES MATERIAL DATED:	
APPROVED BY:		DATE:	29 June 2018

PURPOSE

The purpose of this Chapter is to implement relevant provisions of the Indian Gaming Regulatory Act (IGRA) (25 U.S.C. § 2706, 2710 and 2712), the National Indian Gaming Commission (NIGC) regulations, the Cherokee Nation Code Annotated Title 4 (Gaming Ordinance), the Tribal-State Compact, and other applicable laws and regulations relating to the role and responsibility of Cherokee Nation Gaming Commission (CNGC) to regulate gaming systems, components, and devices within the jurisdiction of CNGC.

SCOPE

This Section shall cover the play of the game “Roulette,” and any variations thereof, and any instruments used in connection therewith, as approved by the CNGC.

AUTHORITY

Title 4 § 22 CNCA
Tribal-State Compact Part 5 (A)
Tribal-State Compact Part 5 (G)

A. DEFINITIONS

1. *Enterprise* – The entity conducting gaming operations on behalf of or as authorized by the Cherokee Nation.
2. *Cherokee Nation Gaming Commission (CNGC)* – The regulatory body established by the Cherokee Nation to oversee and regulate the conduct of gaming on lands owned by the Cherokee Nation.
3. *Compact Game* – An electronic and/or card/table game authorized under the model compact and as described in O.S. Title 3A.

4. *State Compliance Agency (SCA)* – The agency charged with overseeing compact gaming on behalf of the State of Oklahoma; currently, the Office of Management and Enterprise Services.
5. *System of Internal Controls (SICS)* – An overall operational framework for a gaming operation that incorporates principles of independence and segregation of function, and is comprised of written policies, procedures and standard practices based on overarching regulatory standards specifically designed to create a system of checks and balances to safeguard the integrity of a gaming operation and protect its assets from unauthorized access, misappropriation, forgery, theft, or fraud.

B. ROULETTE BALL & TABLE LAYOUT

1. A roulette ball must be made completely out of a nonmetallic substance and not less than 12/16 inch or more than 14/16 inch in diameter, unless otherwise approved by the CNGC.
2. Roulette shall be played on a table having a Roulette wheel of at least 30 inches in diameter at one end of the table and a Roulette layout imprinted on the opposite end of the table.
3. A single zero (0) Roulette wheel must have 37 equally spaced compartments around the wheel where the Roulette ball may come to rest. The Roulette wheel must also have a ring of 37 equally spaced areas to correspond to the position of the compartment with a compartment marked zero (0) and colored green and the others marked 1 to 36, which must be placed around the wheel in a clockwise manner and follow the standard placement for Roulette. The color of each compartment must correspond to the colors on the wheel and on the table felt, as approved by the CNGC.
4. Any variations of Roulette must meet the same requirements as stated in number 3 above along with any modifications approved by the CNGC.
5. A double zero (00) Roulette wheel must have 38 equally spaced compartments around the wheel where the Roulette ball may come to rest. The Roulette wheel must also have a ring of 38 equally spaced areas to correspond to the position of the compartment with a compartment marked zero (0) and a compartment marked double zero (00), both compartments colored green, and the others marked 1 to 36, which must be placed around the wheel in a clockwise manner and follow the standard placement for Roulette. The color of each compartment must correspond to the colors on the wheel and on the table felt, as approved by the CNGC.
6. A double zero (00) Roulette wheel and double zero (00) table layout may be used as a single zero (0) Roulette wheel and single zero table layout if:
 - a. The double zero (00) wager area on the layout is obscured with a cover or other device approved by the CNGC, which clearly indicates the double zero (00) wager is not available.

- b. Signage is posted at the Roulette table to notify players of the following:
 - i. The double zero (00) Roulette wheel is being used as a single zero Roulette wheel and that double zero (00) is not an available wager.
 - ii. If the Roulette ball comes to rest in the compartment marked double zero (00), the spin will be declared void and the wheel will be re-spun.
 - iii. Wagers on red, black, odd, even, 1 to 18, and 19 to 36 shall be lost if the Roulette ball comes to rest in a compartment marked zero (0).
7. The layout for a Roulette table shall be submitted for review and approval by the CNGC and contain, at a minimum:
 - a. Specific betting areas for the placement of the wagers authorized by the CNGC.
 - b. Signage indicating the minimum and maximum wagers permitted at that table.
8. Each Roulette table must have a drop box and a specified location, as approved by the CNGC, in which to temporarily affix a tip box.

C. INSPECTION AND SECURITY PROCEDURES

Each wheel and ball must be inspected in accordance with a method prescribed by the Enterprise, as approved by the CNGC; no changes to the inspection method may be made or implemented without prior written authorization from the CNGC.

D. MAKING AND REMOVAL OF WAGER

1. All wagers at Roulette shall be made by placing Roulette chips on the appropriate areas of the Roulette layout. Verbal wagers accompanied by cash may not be accepted.
2. Allowable wagers must be included in the game rules, which must be submitted to the CNGC for review and approval. No changes may be made to approved game play rules without written authorization from the CNGC.
3. Side wagers between players, players and the Dealer(s), or observers are prohibited
4. Minimum and maximum wagers are to be posted in clear view at or on the table.
5. The Enterprise must provide a method for addressing tokes and toke wagers, which must receive approval by the CNGC, along with any subsequent modifications, prior to being implemented.

E. PAYOUT ODDS

1. The Enterprise shall payout winning Roulette wagers according to the odds contained in the game play rules as approved by the CNGC.
2. When Roulette is played on a double zero (00) wheel being used as a single zero wheel, the following shall apply:
 - a. Notice shall be provided that the double zero (00) wheel is being used as a single zero wheel.
 - b. If the Roulette ball comes to rest on a compartment marked double zero (00), the dealer shall announce “no spin,” declare the spin void, and re-spin the wheel.

F. IRREGULARITIES

1. If a player or Dealer error occurs, the table games supervisor may offer the player, at the supervisor’s discretion, remedies to correct the error so long as they are not in conflict with approved game rules, internal controls, or table games standard operating procedures.
2. Table games management has the authority to handle unspecified irregularities and disputes at their discretion; provided any decision made is in accordance with Enterprise dispute resolution procedures approved by the CNGC.
3. Table games management must notify the CNGC if any player is involved in suspicious activity or if any regulation violation is suspected or verified.