

## **Colorado Limited Gaming Control Commission**

### ***Internal Control Minimum Procedures (ICMP)***

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## **SECTION 3**

### **PLAYER BANKED POKER**

Refer to ICMP Table Games Section 2 for house banked poker variation game requirements

#### **A. GENERAL**

##### **Poker Room**

Licenses must have a minimum of one shift for each twenty-four hour period but may elect to have more than one shift per gaming day. Required gaming documents must be maintained for each shift.

Only items necessary for the operation of the pit are allowed in the pit. Extraneous items are not allowed in the pit. An extraneous item is defined as anything that can conceal money and/or chips and leave the pit. Currency in wallets or money clips is allowed in the pit so long as it is kept in the person's pocket. If a Mobile ATM unit is used it must be maintained and locked in the pit podium when not in use.

No money is to be maintained in the pit podium other than tournament entry and buy-in fees. This money must be kept in a separate, locked drawer. If a poker room maintains its own imprest bank, then procedures must be in place to ensure the protection of the assets. A poker bank exchange form is used when the poker room imprest bank needs to purchase chips from the cashier cage. If table tray banks are maintained in the poker room, the table tray inventory must be carried as part of the pit imprest bank inventory.

Lammers must be kept in a secure place accessible only to the persons who supervise the dealers.

The licensee is responsible for creating a house policy that addresses the situation where a drop box automatically locks itself during the course of play. This policy must ensure for the adequate protection of assets. If the drop box or bill validator cash box must be replaced, procedures must ensure the contents of the replacement drop box or bill validator cash box can be combined and attributed to the individual table during the count. If the drop box or bill validator cash box cannot be repaired or replaced, the table must be closed until a functional drop box or bill validator cash box is available. Written policy must be provided to the Division upon request.

##### **Poker Room Supervision**

Adequate supervision of the table games pit/poker room must be maintained at all times. Adequate supervision means having one or more licensed employees who are knowledgeable in the games supervised and the regulatory requirements of such games, and are able to adequately monitor the play on all tables.

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Licenses offering table games must have a pit supervisor in the pit at all times when tables are open for play.

Licenses offering table games must submit to the Division's Table Games Committee Chair a written pit supervision plan, which details how adequate supervision is going to be achieved. Written approval must be received from the Division prior to offering any table games for play. A copy of the approved plan must be maintained in the pit area.

Licenses must have a house policy for dealers/supervisors changing roles during a shift. At the discretion of the licensee, the tips may be distributed by house policy; therefore, the house policy must include receiving and distribution of tips. If the employees share or pool tips, this must be addressed in the posted house rules.

The pit supervisor, if not permanently relieved by a dealer, must be relieved by another pit supervisor, a shift manager, or other licensed employee knowledgeable of the games being played.

Licenses utilizing automatic card shufflers must maintain the shufflers in good working order. A copy of the shuffler maintenance log or other documentation indicating regular maintenance performed on the shuffler(s) must be maintained in the pit area.

#### **Proposition Players**

A proposition player ("Prop" or "House Player") is only allowed to play in a game when he/she is told where to play by the pit supervisor. A proposition player will not decide when and where he/she will play in a game. This could be considered a violation of C.R.S. 30-814(2).

When a proposition player is also a licensed dealer, there may be only one switch during a shift. A dealer who has been working as a dealer, and is then used as a proposition player, will not be allowed to resume dealing duties for the remainder of the shift. A proposition player who has been working as a proposition player and then works as a dealer will not be allowed to resume duties of a proposition player during the remainder of the shift.

All licenses employed as a proposition player will follow regulations set forth in CLGR 30-1048.

#### **B. JACKPOT AWARD PROCEDURES**

##### **General**

If one table is to be used in a single shift for two or more dissimilar poker games that offer jackpot awards, the jackpot award drop box must be removed, secured, and replaced between game changes. A poker jackpot award drop log must be maintained to document when the

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jackpot award drop boxes are exchanged between shift changes. Jackpot award drop boxes must be clearly marked.

Someone independent of the poker room must record the amount of the jackpot award liability on a daily basis on the poker jackpot log each day the pit is open for any part of the 24 hour gaming day. The poker jackpot log must be forwarded to accounting at least once a month and whenever a jackpot is awarded.

#### **Updating the Jackpot Award**

If the licensee offers a patron funded jackpot award, the contribution amount is counted, and the award amount is updated daily at the same time each day the pit is open for any part of the 24 hours gaming day. Upon completion of the table game count, the count team leader delivers the copy (yellow) of the jackpot count cards to the cashier, where the cards are retained until retrieved by the designated person to update the jackpot liability. Upon updating the liability amount(s), the jackpot count cards are deposited in the locked accounting box.

See Rule 10 for more information regarding jackpot awards.

#### **Awarding the Jackpot**

The jackpot amount awarded to the winner(s) shall be recorded on a two-part form titled table games payout form. Refer to the Table Games section for an example of this form.

The pit supervisor, or his/her designee acting in an administrative capacity, completes the table games payout form, which includes, but is not limited to, the following information:

- a. Date,
- b. Shift,
- c. Time,
- d. Table number,
- e. Seat number,
- f. Winning patron information,
- g. Dollar amount of award,
- h. Taxes withheld, and
- i. Net amount awarded to patron.

The pit supervisor signs both parts of the form indicating proper completion of the form and initiates the request for the funds.

An independent verifier (i.e., security) takes both parts of the form to the cage for payment or to the custodian of the poker room imprest bank for payment.

The cashier or the imprest bank custodian counts the funds, signs the jackpot payout form indicating accuracy and proper completion of the form, and verifying the funds to be disbursed.

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The verifier transports the funds and the original (white) form to the table. The cashier or imprest bank custodian keeps the copy (yellow) of the table games payout form documenting the disbursement of the funds.

The patron is paid. The independent verifier signs the original (white) form, indicating the amount stated on the table games payout form agrees with the amount given to the patron.

The patron signs the original (white) form upon payment of the award, indicating receipt of the funds.

Once the jackpot is paid, the original (white) table games payout form is immediately deposited in the locked accounting box by the verifier.

#### **C. POKER IMPREST EXCHANGE AND INVENTORY PROCEDURES**

Even exchanges of chips, tokens, and/or coins (hereafter, in all subsections, referred to as “chips”) may be made at the cage or the poker room imprest bank. Even exchanges of chips for player banked poker tables with imprest banks located in a pit must be made at the cage and documented on an exchange form.

Adequate procedures must be in place to ensure the protection of assets and player funds.

##### **Even Exchanges**

Even exchanges of chips, tokens, cash, and/or coins (hereafter, in all subsections, referred to as “chips”) may be made between a poker room imprest bank and the cage.

Licensees must have adequate procedures in place to mitigate the possibility of theft during any even exchange transaction, and those procedures must be approved by the Division’s Table Games Committee Chairperson prior to play being offered on any Player Banked Poker game. At least one person independent of the poker room, such as a runner or the cage cashier, must be involved in the transaction.

Even exchanges involving funds from a table tray imprest bank can be made between the table and either a poker room imprest bank or the cage. Adequate procedures must be in place to ensure funds moving to and from a table tray imprest bank are accounted for at all times, i.e., the use of an even exchange form, lammers or a similar marking system, or the procedure itself used to exchange the funds mitigates the possibility of theft.

##### **Poker Room Imprest Bank Inventory Procedures**

Poker room imprest banks must be inventoried and verified by the licensee responsible for the bank and another licensed employee at shift opening, shift change, and shift closing using an imprest bank inventory form. If the poker room imprest bank is used for more than 12 hours

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during a gaming day, at least two shifts must be conducted for inventory and shift change purposes. All required gaming documents must be maintained for each shift. The inventory form is deposited into the locked accounting box upon completion. Any overages or shortages must be documented in writing and the gaming manager or designee oversees the investigation of the overages and shortages.

The table tray imprest banks are maintained on the table. The table tray imprest banks must be inventoried and verified by the supervisor and a dealer. Prior to the table being opened for the gaming day and when the table is closed for the gaming day, the two verifiers (one must be independent of the poker room) count the table tray imprest bank and complete the imprest bank inventory form at the table. If the table is not opened, the table tray imprest bank must be inventoried at least weekly. The inventory form is deposited into the locked accounting box upon completion. When the tables are not in use, the table tray imprest banks are locked.

#### **D. TABLE GAMES TOURNAMENT PROCEDURES**

Table games tournaments may be conducted among several licensees. Refer to CLGR 30-144 and 30-1045 for multi-licensee tournament requirements.

All required forms must be completed for all tournaments held.

Tournament chips must be inventoried prior to and upon completion of every tournament/event to ensure all tournament chips are accounted for. The inventories must be documented and detailed by the color of the chip. Additionally, the document must include the date and signatures of the individuals completing the inventory. If there is a discrepancy, an internal investigation is conducted. The investigation and results of the investigation are documented. Any missing tournament chip(s) representing 1000 points or larger in a single chip or combination of chips that remain missing after 48 hours from the end of the tournament/event is reported to the Investigations Section of the local Division office. The documented inventory(s) is forwarded to accounting upon completion.

#### **Entry Fees and Buy-ins**

Entry fees are any amount collected for a tournament by the licensee not applied to the prize pool. This amount is reported as adjusted gross proceeds on the licensee's gaming tax return in the month the fee was collected. All buy-ins collected for a tournament are used to fund the prize pool and must be paid back in their entirety to the players during the tournament.

Tournament entry fees and buy-ins must be documented on the Table Games Tournament Entry Fee & Buy-In Log. The following information is completed at the time the entry fee or buy-in is collected:

- a. Name of patron, and
- b. Amount of the entry fee and/or buy-ins.

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One line shall be completed per patron, recording the entry fee, all buy-ins, and the total of all entry fees and buy-ins. Patrons that provide a ticket or purchase ticket as an entry fee or buy-in must have the ticket validated and redeemed immediately. The amount of the entry fee or buy-in must be reflected on the form. Patrons that receive complimentary (comp) entries into the tournament must also be listed on this form. The comp entry fees and buy-ins are listed on the form, and the total is reflected in the total comp column. If the entry fee is other than cash (e.g., toy, food, etc.), a dollar value is assigned to the item and is recorded as the entry fee as appropriate on this form, and the total is reflected in the total non-cash column. A notation is made on the form stating the non-cash items received (e.g., toy, food, etc.).

All monies collected as entry fees and buy-ins are maintained in a secure manner and must not be commingled with other funds.

When the entry fee/buy-in period closes, or at a minimum on a daily basis, two licensed employees, one of whom is independent of the pit department, count the monies collected from the entry fees and buy-ins and compare the amount to the total on the table games tournament entry fee & buy-in log, noting any variances. The two licensed employees sign the Table Games Tournament Entry Fee & Buy-In Log attesting to the amount counted and recorded.

The monies and the Table Games Tournament Entry Fee & Buy-In Log must be immediately delivered to the cashier cage or to the tournament bank maintained in the pit by the two licensed employees. If the monies and log are delivered to the cashier cage, the cashier independently counts the monies and compares the total counted to the total amount recorded on the Table Games Tournament Entry Fee & Buy-In Log and signs the log indicating agreement of the total amount recorded and the receipt of the monies. The cashier then receipts the monies into the cashier cage and records the total amount on the Daily Cash Summary as table games tournament entry fees and buy-ins. If a tournament bank maintained in the pit is used, the monies are receipted into the tournament bank and recorded as such on the bank paperwork.

The Table Games Tournament Entry Fee & Buy-In Log must be immediately deposited in the locked accounting box by one of the two employees performing the count.

Entry fees for all table games tournaments are considered adjusted gross proceeds and shall be reported as such on the gaming tax return in the month in which the entry fee(s) are collected. If the entry fee is a non-cash item such as a toy, food card, canned goods, etc., the licensee must establish a predetermined cash value (equivalent to the cash entry fee) of the item and record this value as the entry fee on the required tournament form. Complimentary entry fees paid by the licensee shall also be considered adjusted gross proceeds. If an entry fee is collected for the tournament, the licensee must complete a tournament form listing each entrant and the dollar value of the entry fee for each entrant, regardless of how the entry fee was collected or paid. Each entrant listed on the tournament form must have an associated entry fee. Free tournaments where no entry fee is collected for any entrant results in zero adjusted gross proceeds. The licensee may not declare a loss against adjusted gross proceeds for tournaments.

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#### **Awarding Prizes**

The cost of all prizes and monies paid to winner(s) is recorded on a two-part form titled the Table Games Payout form. The payout forms must be sequentially numbered with an alphanumeric numbering sequence. A Table Games Payout form is completed for each winner.

The pit supervisor or his/her designee completes the table games payout form, which includes the following minimum information:

- a. Date,
- b. Time,
- c. Shift,
- d. Table number,
- e. Seat number,
- f. Patron name,
- g. Patron's address,
- h. Dollar amount of prize (if merchandise, this is the cost of the item),
- i. Description of award, including tournament description,
- j. Taxes withheld,
- k. Gambling Payment Intercept withheld, if applicable, and,
- l. Net amount awarded to patron.

The pit supervisor or his/her designee signs the form indicating proper completion of the form.

A verifier, who is independent of the pit department, verifies the payment and signs both parts of the form, indicating the amount stated on the Table Games Payout form agrees to the amount paid to the patron. Upon receipt of the funds, the patron signs the form indicating receipt of the payment.

The original (white) of the Table Games Payout form is immediately deposited in the locked accounting box by the verifier.

The copy (yellow) of the Table Games Payout form shall be retained with the bank from which the prizes were disbursed. After all prizes are awarded, the copy (yellow) is placed in the locked accounting box by the person disbursing the prizes, other than the verifier.

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## **FORMS**

Following is a description of the forms discussed in this section. In some cases, sample forms are provided. **It is the licensee's responsibility to ensure that all forms meet ICMP requirements.** See General section for further clarification.

### **Poker Bank Exchange Form**

The Poker Bank Exchange Form is used to replenish the poker room imprest bank or the poker table tray bank with chips as an even money exchange with the cashier cage.

### **Poker Jackpot Award Drop Log**

The Poker Jackpot Award Drop Log is used to document the soft drop time and related information for the changing of the jackpot award drop boxes, if different than the regularly scheduled soft drop.

### **Poker Jackpot Log**

The Poker Jackpot Log is used to document information about changes to the poker jackpot award. It is updated each day the pit is open for any part of the 24 hour gaming day by someone independent of the poker room, with the current poker jackpot award amount. The log is forwarded to accounting at least once a month or whenever a poker jackpot is awarded.

### **Imprest Bank Inventory Form**

Please see the Imprest Bank Inventory Form as described in the Cashier section.

### **Other Forms**

Other forms associated with poker are the Request for Fill/Credit Slip, Fill/Credit Slip, Opener/Closers, Early Table Drop Log (which can be found in the Table Game section); and the Table Games Activity Log (which can be found in the Table Games Equipment section).

### **Table Games Payout Form**

The Table Games Payout form is a two-part alphanumeric form used to document the amount awarded to patrons, either for player banked poker jackpot awards, or tournament prizes. All un-issued Table Games Payout forms are securely stored and maintained in accounting with the controller/bookkeeper, owner/operator, and gaming manager having access to the slips.

### **Table Games Tournament Entry Fee & Buy-In Log**

The Table Games Tournament Entry fee & Buy-In Log is used to record the entrance fees and buy-ins made by or for each patron participating in the tournament.

### **Table Games Tournament Buy-In Log (Multi-Licensee)**

The Multi-Licensee Table Games Tournament Buy-In Log is used to record the buy-ins made by each patron participating in the tournament. Copies of these forms are forwarded to the designated licensee on a daily basis.