

Colorado Limited Gaming Control Commission
Internal Control Minimum Procedures (ICMP)

SECTION 15

TABLE GAMES EQUIPMENT

The licensee must inspect and approve all gaming equipment in the table games area before use. All surveillance systems and camera coverage of all gaming activity and devices must receive initial approval from the Division prior to being utilized. After the initial approval, the licensee will approve all changes to its cameras. The procedures in this section do not apply to player-banked poker.

All gaming equipment must be maintained in good working order or removed from play. This includes, but is not limited to, card shoes, automatic card shufflers, validation units, bill validators, printers, dice, roulette wheels, Big 6 Wheel, roulette balls, Pai Gow tiles, drop boxes, dealer tip boxes, token tubes and table tray lids. All gaming fund on the tables must be secured when the table is not in use.

A. CARD, TILES, AND DICE INVENTORY

The licensee is required to have a locked storage area for cards (including pre-shuffled bricks of cards), dice, tiles, and ticket paper stock. The licensee must have a storage area located on site. All on site storage areas shall have two separate locks, shufflers are not be used as secondary storage. The Security Department shall maintain one key, and the Table Games Department shall maintain the other key. If the licensee has a secondary storage area off site it must be secure and approved by the Division. A description of the secondary location must be included in the pit supervision plan.

The licensee reserves the right to use pre-shuffled card (pre-shuffled bricks). Cards are inspected and guaranteed by the manufacturer to be complete and accurate. The manufacturer provides security devices on each pre-shuffled deck/brick such as seals, tabs, and the number of each person at the manufacturer that verifies and inspects each pre-shuffled deck/brick. The cards are brought to the table (monitored under surveillance review) at which time the seal is the boxes or decks of cards will be opened and cards removed from the box by the table games supervisor and placed directly into a shoe or the automated shuffling device by the dealer and the automated shuffling machine reshuffled and mixes the cards again before dealing commences. No further inspection of cards is necessary. Pre-shuffled cards are only used on games that use shuffle machines provided that each shuffle machine verifies each card and can identify any card that may be missing. In the event that a card is missing, the licensee will inspect the full decks and replace the missing cards and notify the manufacture of the error using the inventory number as a reference.

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The licensee may utilize the pit podium for storage of cards, dice, tiles, and ticket paper stock inventory. The licensee may store as many sets of cards, dice, tiles, and ticket paper stock necessary for daily operations in the pit podium. The pit podium, when utilized at this capacity, will not be considered secondary storage.

Licensees are required to develop procedures and maintain logs that indicate a correct inventory of cards, tiles, and dice from receipt to cancellation and/or destruction. The inventory logs must be accurate, legible, and easy to understand. The casino is required to have staff immediately available that understand the inventory process/logs and can explain any inquiry from the Division during inspections.

A Card, Tiles, and Dice Storage Inventory Log that documents when cards, tiles, and dice are received into storage and removed to the floor shall be maintained in the storage area and be subject to review by the Division upon request.

A Card, Tiles, and Dice Pit Inventory Log that documents when cards, tiles, and dice are received at the pit podium and removed for destruction shall be maintained in the pit area and be subject to review by the Division upon request.

A Card, Tiles, and Dice Cancellation/Destruction Log that documents when cards, tiles, and dice are cancelled/destroyed shall be maintained in the destruction area and be subject to review by the Division upon request.

On a quarterly basis, accounting or the internal compliance officer must perform a physical count and reconcile to the card, tiles, and dice inventory and cancellation/destruction logs. Once the reconciliation is completed, accounting (or the internal compliance officer) shall sign off on the ending inventory. The reconciliation is forwarded to table games management acknowledging the results of the inventory.

B. CARD, TILES, BIG 6 WHEEL, AND DICE INSPECTION AND CONTROL

The licensee shall inspect all cards, tiles, dice, and the Big 6 Wheel prior to use in a game. The front and back of each card must be checked to ensure that it is not flawed, scratched or marked in any way. Each die must be inspected with a micrometer, balancing caliper, a steel set square and a magnet, or any other instrument approved by the Division. These tools must be maintained in the pit area and made available for use by the Division upon request.

When a card, tiles, or die is found marked, bent, flawed, and unusable or tampered with in any way during the course of play, a new card, set of tiles, or set of dice will be issued to the game. Any card or die found to be flawed, damaged or tampered with, either prior to play or during the course of play, shall be placed in a sealed envelope or container, labeled with the table name, date, time and signature or initial of the dealer/box person and pit supervisor. Where a licensee has no reason to believe that damaged or flawed cards, tiles, or dice in a sealed envelope or

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container were damaged or flawed as a result of an unlawful act, motive, or scheme, the licensee may dispose of such cards, tiles, and dice after 30 days in any manner designed to prevent their future use in limited gaming.

Cards, tiles, and dice must be protected at all times. When a table has not had any play for 30 minutes, the cards must be spread or placed in the discard rack except for tables that utilize a shoe or shuffling device. Dice that have been placed in a cup for use in gaming shall never be left unattended and shall never remain on a table for more than 24 hours. The licensee shall have procedures in place for Pai Gow tiles if there is no gaming activity at the Pai Gow Tiles table.

INSPECTION AND SECURITY PROCEDURES FOR PAI GOW TILES

When Pai Gow tiles are received at the table, the dealer will receive, sort and inspect one (1) set of tiles after receiving the set from the pit supervisor. The pit supervisor must verify the inspection. If the tiles have been previously used, the dealer should clean the tiles.

The dealer will sort the tiles into pairs to ensure a complete set. This is done by placing the tiles side by side to check for continuity in size and color. Examine the back and side of each tile for any marks, scratches, flaws or marked in any way that could identify it uniquely.

- 1) If any unsuitable tiles are found a completely new set of tiles is substituted from the podium, or storage.
- 2) The original set is sealed in a bag or container. The improper set is then identified by table number, date and time. The dealer and pit supervisor must then sign the bag or container.

After the inspection of the tiles by the dealer and pit supervisor, the tiles are turned “face up”. The tiles are then sorted in pairs and arranged according to rank, starting with the Supreme Pair (Gee Jun) and all 15 Matched and Unmatched Pairs for a total of 16 Pair. The tiles remain in pairs for visual inspection by the first patron to arrive at the table. After the first patron has inspected the tiles, they are turned “face down” on the table. The retail licensee shall have dealer procedures if there is no gaming activity at the Pai Gow Tiles table.

Pai Gow Tiles shall be played with three dice which shall be maintained at all times inside a Pai Gow shaker while at the table. The Pai Gow Tiles shaker and the dice contained therein shall be the responsibility of the dealer and shall never be left unattended while at the table. No dice that have been placed in a Pai Gow Tiles shaker for use in gaming shall remain on a table for more than 24 hours.

All tiles, shaker and dice must be secured when the table is not in use.

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INSPECTION AND SECURITY PROCEDURES FOR BIG 6 WHEEL

Prior to opening the Big 6 Wheel game each day, the pit supervisor shall visually inspect the wheel to ensure all [54] sections are intact and no signs of wear are present. The paddle shall also be visually inspected to ensure proper working conditions.

Any game markers and equipment used for the Big 6 Wheel game, must be secured when the game is not open.

C. CARD, TILES, AND DICE CANCELLATION/DESTRUCTION

Cancellation and/or destruction of cards removed from play must be by shredding, drilling a circular hole of at least one fourth inch (1/4") in diameter, corner cut or other means approved by the Division.

The licensee may destroy dice by drilling a circular hole of at least three-sixteenths of one inch (3/16") in diameter through the center. All dice removed from a game, except those retained for Division inspection must be immediately cancelled to prevent reintroduction of the dice to the game. Cancellation must occur by use of a cancellation tool, scribe or any other tool to produce a cancellation mark that is permanent and clearly visible on each die. Licensees have the option to destroy the cancelled dice.

Cancellation and/or destruction of tiles removed from play must be by drilling a circular hole of at least one fourth inch (1/4") in diameter, in the center of the tile or other means approved by the Division.

D. MARKING UP ROULETTE CHIP VALUES; CHIP INVENTORY

Licensees must have a procedure in place to adequately identify the worth of non-value chips being used in roulette.

Licensee must possess at least six unique colored sets of non-value chips for each roulette table offered for play.

Licensees must have procedures in place for the reporting of missing non-value chips. The procedures must include:

- a. How the licensee will determine missing non-value chips.
- b. How the licensee will report to the division when ten or more non-value chips of one color missing from the table in a gaming day.

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Unused and excess non-value chips shall be stored in a secure location, which is a dual locked area, or secured in such a way that access to the non-value chips would be evident. The storage location must be under surveillance. Since these stored non-value chips are not used in the normal course of business, they are not required to be inventoried on a daily basis. Instead, they are inventoried each time they are accessed. A separate documented inventory is completed by the two licensed individuals accessing these non-value chips. If these chips are secured at all times and not accessed the last known inventory count can be used for the quarterly non-value chip reconciliation. Additionally, a log shall be maintained with the non-value chips and the log must be completed each time they are accessed. The date, individuals accessing the chips and the reason for accessing the chips are recorded on the log.

E. INSPECTION AND SECURITY PROCEDURES FOR ROULETTE EQUIPMENT

A gaming manager, pit supervisor or a licensed member of security must perform the inspection and security procedures outlined in GLGR 30-2212 prior to opening a roulette table for gaming activity, or at least once a gaming day for an open table or more frequently if necessary.

Any adjustment or replacements to the wheel must be documented in a log that is kept in the pit area and made available to the Division for inspection upon request.

All roulette chips, roulette balls, and Pai Gow tiles must be secured when the table is not in use.

F. COMMUNICATION EQUIPMENT

Licensees using mobile ATM and/or EBT devices at gaming tables must develop controls over the hardware to ensure data at rest and data in transit is secure.

G. SHUFFLERS

The Dealer must notify the pit supervisor when the shuffler identifies any error. When the shuffler jams while the cards are being shuffled, the pit supervisor must remove all cards from the shuffler and check the cards for damage. If no damage is identified, the pit supervisor must reverify the cards through the shuffler and verify that all cards are accounted for. A house policy must be provided in the pit supervision plan when missing or extra cards are identified on the automatic shuffler device.

Surveillance video must be able to view and record all error indicators on all shufflers being used on all table games.