

**(Casino Name)**  
**ICO REPORT PART I**  
**(January 1 through June 30, Year or July 1 through December 31, Year)**  
**(ICO Name)**

**Note:** Part I of the ICO Report includes the General, Table Games, Poker, Surveillance System Standards, Dealer Tips and Table Games Equipment ICMP sections and related ICO checklists. Each of these sections must be included in this report. See ICO Instructions for sample wording if the section does not apply or no issues were noted during the testing.

*(The following are examples of how to draft noncompliance issues noted during your review.)*

The following non-compliance items were noted during the internal compliance audit of the *Casino* for the period of (January 1, Year through June 31, Year or July 1, Year through December 31, Year). Management responses are included.

## **General**

### **NONCOMPLIANCE ISSUES:**

1. CLGR 30-414 requires licensees to permanently display in a conspicuous manner a notice (signage) that "IT IS UNLAWFUL FOR ANY PERSON UNDER THE AGE OF TWENTY-ONE TO ENGAGE IN LIMITED GAMING." This sign is not displayed in a conspicuous manner.

### **ICO RECOMMENDATION:**

I recommend posting a sign containing this language by all the exterior doors of the casino.

### **MANAGEMENT RESPONSE:**

The required signage was posted by all the exterior doors on MM/DD/YY.

## **Table Games**

### **NONCOMPLIANCE ISSUE:**

1. While reviewing the paperwork associated with the DD/MM/YY Bonus 6 jackpot in the pit, it was noted that the pre-numbered Request for Table Games Jackpot Payout Slip was used out of sequence. On that date, slip #A0008 was voided and replaced with slip #A0011.

Further investigation showed that slip #A0009 was used for the following jackpot on DD/MM/YY. The table games auditor had correctly logged the actual forms used.

### **ICO RECOMMENDATION:**

I recommend that all pre-numbered forms be used sequentially to comply with the ICMP and strengthen internal control. If a form is used out of sequence, I recommend that the "missed" slips are properly voided.

### **MANAGEMENT RESPONSE:**

Accounting voided slip #A0010 to ensure slips remain in sequential order. Additionally all Blackjack supervisors were coached on the importance of using restricted gaming forms in correct sequential order as per ICMP.

### **NONCOMPLIANCE ISSUE:**

2. The ICMP states "At the beginning and end of each shift, each table game tray must be inventoried by the pit supervisor and another licensed individual. An inventory must be taken and recorded at the beginning and end of each shift, even if a table has been closed for the entire shift." During inspection on

MM/DD/YY it was determined not all tables are being counted down at the beginning of the day shift. Some were being counted down later in the day before they are opened.

**ICO RECOMMENDATION:**

The pit supervisors need to ensure an inventory is taken for all tables at the beginning of each shift and personnel should read the ICMP so they are aware of the requirements relating to their job responsibilities. Please consult with the Table Games auditor to keep in mind that when performing the table audit the day shift openers should have a time written on them which should be close to the time the pit opened for that day.

**MANAGEMENT RESPONSE:**

I have spoken with the Table Games Manager regarding all tables not being inventoried prior to opening the pit. The Table Games Manager will make copies of the ICMP pertaining to table games for the Pit Supervisors and will train them on opening and closing procedures. Table Games Auditor has been counseled to pay closer attention to the times recorded on the openers to ensure that they are being inventoried in a timely manner. If they are not, the Auditor will notify the ICO and the Table Games Manager.

## **Poker**

**NONCOMPLIANCE ISSUE:**

1. The ICMP states currency in a wallet, which is kept in a pocket, is allowed. I noted dealer John Doe had currency and tokens on his person that was not in a wallet.

**ICO RECOMMENDATION:**

The poker room supervisor needs to train the poker dealers on the proper procedures and spot check the dealers to ensure they are in compliance with this requirement.

**MANAGEMENT RESPONSE:**

The poker room supervisor sent a memo to all dealers outlining the requirement. The poker room supervisors will spot check the dealers on a weekly basis.

## **Surveillance System Standards**

**NONCOMPLIANCE ISSUE:**

1. Camera 39 (portion of floor coverage) was not recording properly. The image was all white (snow). This began approximately 5:30 pm on MM/DD/YY and image was restored at 7:30 am on MM/DD/YY. Reviewed surveillance room access camera, no individuals accessed the surveillance room at the time image was lost. A review of the Drop Comparison Report for this drop showed no unresolved variances.

**ICO RECOMMENDATION:**

Security personnel or Shift Managers need to check camera images in surveillance room prior to drop commencing and on a regular basis to verify equipment is properly working.

**MANAGEMENT RESPONSE:**

This procedure will be implemented as of MM/DD/YY.

**NONCOMPLIANCE ISSUE:**

2. During the count, the count team members, whether removing monies from the bucket or box, counting, sorting, or verifying, must not obstruct the camera view of the monies.

On surveillance review of drop and count for MM/DD/YY, the drop team was conducting the coin count off of the cart. The cart was partially blocking the view of the count in progress and one could not see the weigh scale. A review of the Drop Comparison Report for this drop showed no coin variances.

**ICO RECOMMENDATION:**

Counsel count team members on the necessity of not blocking camera coverage with the drop cart.

**MANAGEMENT RESPONSE:**

The count team supervisor will train the count team on the proper procedures and will review additional surveillance tapes to make sure proper procedures are followed.

**Dealer Tips**

**NONCOMPLIANCE ISSUE:**

1. Tips must be clearly identified by the dealer when received and immediately deposited into a locked token box at the table. All token boxes must be securely maintained at all times.

While observing dealer Jane Doe on MM/DD/YY I noted she did not consistently identify her tips prior to depositing the tips in the token box.

**ICO RECOMMENDATION:**

The pit supervisor should train the dealers on the proper procedures of accepting tips.

**MANAGEMENT RESPONSE:**

The pit supervisor sent a memo to all dealers outlining the proper procedures for accepting tips.

**Table Games Equipment**

**NONCOMPLIANCE ISSUE:**

1. This section is not applicable. No further action required.

**ICO RECOMMENDATION:**

N/A

**MANAGEMENT RESPONSE:**

N/A