

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

Note: Part IV of the ICO Report includes the Table Games, Slot & Kiosk Drop and Count, Cashier, Key Control, and Accounting 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.

Drop & Count (Table Games)

NONCOMPLIANCE ISSUE:

1. Per ICMP, "after table inventory procedures are completed, a drop team member must exchange the full drop boxes with empty drop boxes. Another drop team member must physically verify that the empty drop boxes are securely locked into place on the tables."

During an observation of the Poker drop, three drop boxes were not verified to be secure on the table.

ICO RECOMMENDATION:

The drop team must ensure all members are aware of and follow all applicable ICMP during the table games drop process.

MANAGEMENT RESPONSE:

This issue has been discussed with the staff members directly involved. Additionally, all Surveillance personnel Leads and Supervisors have been re-educated on the proper ICMP regarding the Table Games Drop procedures.

NONCOMPLIANCE ISSUE:

2. During the review of the soft count performed by floor personnel on MM/DD/YY the opener shows the verifier who indicates the box is empty, but fails to show the camera the empty table box. This was noted for all boxes.

ICO RECOMMENDATION:

The opener should show the verifier the empty box, the verifier indicates that they see the box is empty and then the opener should hold the box up to the camera so surveillance can record that the box is empty. Additional training needs to be provided for all floor personnel performing soft count.

MANAGEMENT RESPONSE:

We will schedule training for all count personnel to make them proficient in soft count procedures. With the recent changes to the security schedule it became necessary to involve personnel that had little training with soft count. I will coordinate with the cage manager to schedule some formal training. The verifier is to show the camera the box is empty before they lock the box back up. I will coordinate with both the security manager and slot manager to set up formal training.

Drop & Count (Slots)

NONCOMPLIANCE ISSUE:

1. Prior to running each denomination through the count machine, two count team members test the machine with a predetermined number of coins or calibrated weights. Team members record the number

of coins tested, and discrepancies, and their signatures on the Slot Summary Report to document the testing process.

On surveillance review of drop and count for MM/DD/YY, the drop team did not use tokens and coins from predetermined test box. I was unable to visually verify the test due to the coin cart blocking view. Test was conducted using drop monies from machines and documented on the Slot Summary Report. A review of the Drop Comparison Report for this drop showed no coin variances.

ICO RECOMMENDATION:

Count team members need to be counseled on the proper procedures and reinforce the necessity of using predetermined test monies from the test box. They also need to be counseled on the necessity of not blocking camera coverage.

MANAGEMENT RESPONSE:

The supervisor of the count team will provide training to the count team regarding the proper procedures and will review additional surveillance tapes to make sure proper procedures are followed. The supervisor will counsel drop team over any irregularities.

NONCOMPLIANCE ISSUE:

2. Before a team member leaves the room, the other team members must stop what they are doing and observe the other team member leave. During a review of the count process it was observed that one team member does not observe the team member leave.

ICO RECOMMENDATION:

The Count Manager must ensure all team members follow the ICMP requiring all team members to stop what they are doing and observe the door the entire time it is open.

MANAGEMENT RESPONSE:

The Count Manager held a team meeting and reiterated the ICMP Policy for leaving the count rooms.

Drop & Count (Kiosks)

NONCOMPLIANCE ISSUE:

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

ICO RECOMMENDATION:

N/A

MANAGEMENT RESPONSE:

N/A

Cashier

NONCOMPLIANCE ISSUE:

1. Bagged coin coming off a jet sort machine must be immediately sealed. If the bags are not color coded to identify the denomination of coin contained within the bag, the bag must be tagged with the denomination. Any bagged coin that does not contain a standard fill amount must be tagged with the amount contained in the bag. A list identifying which color bag corresponds to which denomination, and the standard fill amounts, must be maintained in the cashier cage.

Tested 5 bags and found one nickel bag was short 1 nickel. The cashier was aware of the procedure to complete a Weigh/Wrap Variance Report and one was completed for the aforementioned variance.

ICO RECOMMENDATION:

Continue with the monthly testing by accounting personnel per ICMP.

MANAGEMENT RESPONSE:

Agree

NONCOMPLIANCE ISSUE:

2. On MM/DD/YY, I identified eight straps of \$10 bills with dates exceeding the allowable seven days, some up to 10 days since the straps were last verified and initialed. These straps should have been recounted, initialed and dated within the required seven days.

ICO RECOMMENDATION:

Straps of bills must be recounted, initialed and dated at least weekly. This is a recurring problem. There already is a policy that the cashiers recount, initial and date the straps on a certain weekday. I do believe this is being done. I believe that the cashiers are getting the old straps from the vault. Since this continues to be a problem I have two recommendations that may help solve the problem. I recommend that all Shift Managers be trained to rotate old money out of the vault whenever they do the vault inventory. This will eliminate the problem of the cashier pulling old money out of the vault and putting it into their drawers. And/or make it a policy that the cashier must recount, initial and date all straps taken out of the vault, no matter what the date on it is, prior to it going into the cashier's drawer.

MANAGEMENT RESPONSE:

The Shift Managers are supposed to rotate old money out of the vault first; but the cashiers are supposed to verify any money coming out of the vault to make sure the dates are within the 7 day grace. If not, they are to verify all straps before they go into the drawers. I will be posting a reminder memo to this fact. I will also post a memo in the vault for the Shift managers to make sure they pull old money first so that this doesn't happen again.

Key Control

NONCOMPLIANCE ISSUE:

1. While reviewing the signature cards for restricted keys, it was noted that a security officer checked out key #33 for the card cabinet, but her signature card did not include that key as an authorized key. Further inspection showed that none of the security guards had key #33 listed on their signature cards although they are typically the employees that check out this key.

ICO RECOMMENDATION:

I recommend that all security officer signature cards be reviewed and corrected if necessary to include key #33.

MANAGEMENT RESPONSE:

The signature cards were updated accordingly on MM/DD/YY.

Accounting

NONCOMPLIANCE ISSUE:

1. ICMP Accounting A. General Adequate Explanation Criteria states, "The results of all reviews and investigations must be documented in writing (adequate explanation criteria) as evidence that required procedures have been performed." There is no evidence of investigations on MM/YYYY Hold Report.

ICO RECOMMENDATION:

The Revenue Audit Manager must ensure staff is properly completing and documenting variance investigations.

MANAGEMENT RESPONSE:

Revenue Audit Management will ensure proper investigation and documentation is complete on all required statistical reports. **NONCOMPLIANCE ISSUE:**

2. ICMP Accounting A. General Adequate Explanation Criteria states, "The results of all reviews and investigations must be documented in writing (adequate explanation criteria) as evidence that required

procedures have been performed.” The Blackjack Statistical Report for Month, Year is missing the “Reviewed by:” signature.

ICO RECOMMENDATION:

The Revenue Audit Manager must ensure staff is signing all paperwork reviewed.

MANAGEMENT RESPONSE:

The report was a reprint and did not receive the required review signature. Revenue Audit Management will ensure all required statistical reports are reviewed and signed and dated as evidence of the review.

Noncompliance Issues Found by Accounting From Other Departments

NONCOMPLIANCE ISSUE:

1. Several Closer (white original) forms had “Opener” circled and the table games auditor caught the errors.

ICO RECOMMENDATION:

Please ensure noncompliance items have been documented and tracked to minimize repetitive issues.

MANAGEMENT RESPONSE:

Noncompliance items have been documented and tracked by accounting. Accounting will send notifications to appropriate personnel to inform them of the noncompliance items, which will minimize repetitive issues from occurring.