



# Internal Compliance Officer (ICO) INSTRUCTIONS

The Accounting Section of the Colorado Internal Control Minimum Procedures (ICMP) requires Group B and Group C licensees to complete one full set of ICO Checklists and Attribute Worksheets every six months. For further information concerning the requirements of selecting and reporting the ICO designation to the Division, please refer to the Accounting Section of the ICMP. All documents relating to the ICO testing and reporting are available on the Division's website at <https://sbg.colorado.gov/gaming>.

## SCOPE OF AUDIT PROCEDURES

The forms and reports subject to the criteria detailed below are reflected on the Sample Selection Documentation table, represented by the un-highlighted columns for the Sample Months. There is a corresponding Attribute Worksheet for each of these forms or reports.

The scope and sample size for detailed test work relative to the ICO testing may be unique to each licensee. Determining scope and sample size is a matter of professional judgment. However, at a minimum, three sample dates for tests of gaming documents, summaries and required statistical and summary reports must be tested during each 6-month review period.

The sample dates must be distributed throughout the 6 month period of review. The first sample date must fall within January-February (for the first 6 month review) and July-August (for the second 6 month review). The second sample dates must fall within March-April (for the first 6 month review) and September-October (for the second 6 month review). The third sample dates must fall within May-June (for the first 6 month review) and November-December (for the second 6 month review).

The dates of the documents and reports tested, along with the number of documents tested, are recorded on the Sample Selection Documentation form.

## SAMPLE SELECTION FOR TESTS OF GAMING DOCUMENTS AND REPORTS

The ICO must test at least 5 documents for each type of form (except summary documents, and statistical and supporting reports) for each sample date selected. If there are less than 5 documents available for testing for the sample date selected, then additional sample dates are selected during that two month period. A minimum of 15 documents per form (e.g., jackpot payout, fills/credits, request for fills/credits, etc.) must be tested during the 6-month review period. If any type of form does not have at least 15 documents then test 100% of these transactions. The attribute worksheets are used to document the test results. If there is no attribute worksheet, the form is tested for compliance with the ICMP and the results are documented in the applicable 6-month sample column on the checklists.

The ICO must test a minimum of 3 summary documents for each type of summary document during each 6-month review period. A summary document includes more than one transaction, for example the slot summary, master games sheet, daily cash summary, etc. The ICO must also test the required statistical and supporting reports to coincide with the date of the summary document tested. Use the attribute worksheets and checklists to document the test results. For example, if May 15 gaming date is selected as the sample date to test the slot count paperwork, the corresponding daily cash summary showing receipt of these drop funds is selected for testing. The statistical reports and supporting reports corresponding with and reflecting the activity for the May 15 drop proceeds is

selected for testing. This allows the funds to be traced from the source through the cage to the statistical and supporting reports.

The ICO must perform a review of all the statistical reports for at least 3 sample dates during the 6-month review period. The review must include the current, MTD and YTD data if applicable to the associated report. The Division encourages additional review of the statistical and supporting reports.

Based on the results of the ICO's findings, the ICO may want to expand the number of dates and/or documents tested. Additional guidance may be obtained in the American Institute of Public Certified Accountants (AICPA) literature and Statement on Auditing Standards (SAS) guidelines.

**Note:**

If computerized applications are used, alternate documentation and/or procedures that achieve the objectives of the ICMP will be acceptable. Such alternate documentation and/or procedures must be described in detail as to their acceptability. Any internal control variances that the licensee is using must be supported by written approval from the Division of Gaming. These variances are taken into consideration and tested when completing the checklists.

**OBSERVATIONS**

Observation of casino floor operations (e.g., drops, counts, fills, jackpots, etc.) should not be announced in advance. In a similar fashion, observation of operations in the casino cage and count room should not be announced in advance.

Observations must be carried out at various times throughout the period under examination. This is crucial in maintaining independent, unpredictable testing. All observations should not be performed from the surveillance room. Likewise, the activity under review should not be physically observed every time either. The element of surprise is lost if all observations of the same activity are performed in the same manner every time. At least one complete set of observations must be conducted during each period under review.

**ICO REPORT FORMAT**

The ICO report consists of four parts as follows:

**Part I** – General, Table Games, Poker, Surveillance, Dealer Tips and Table Games Equipment

**Part II** – Slot Machines

**Part III** –TITO and EPCS

**Part IV** – Drop & Count, Cashier, Key Control, Accounting and Noncompliance Issues Found by Accounting from Other Departments

See the Division's website for the report templates. Each ICMP section listed above is included in the respective parts of the report. The ICO must follow the format of the report as shown in the report templates. The following is an example if a section does not apply to the casino:

**TICKET IN/TICKET OUT**

***NONCOMPLIANCE ISSUE:***

This section is not applicable. No further action required.

***ICO RECOMMENDATION:***

N/A

***MANAGEMENT RESPONSE:***

N/A

The following is an example if there are no issues noted by the ICO during his/her review:

**GENERAL**

***NONCOMPLIANCE ISSUE:***

No noncompliance issues noted. No further action required.

***ICO RECOMMENDATION:***

N/A

**MANAGEMENT RESPONSE:**

N/A

**SUMMARY OF TEST RESULTS**

To calculate the "Total Number of Items Inspected" column, use the number of items reviewed in completing each ICO checklist. Sum all applicable boxes on the checklist to arrive at a total number of items inspected. If there are any applicable attribute worksheets, add the number of items reviewed from the attribute worksheet to the number of items inspected from the ICO checklist. This total is posted to the Summary of Test Results.

For example: if the ICO checklist consists of 20 items, 3 of which are not applicable to the casino, the total from the checklist would be 17. If the section requires the completion of an attribute worksheet whereby 5 forms were tested, this would result in 22 items being posted to the Summary of Test Results.

**SUBMITTING ICO REPORTS AND RELATED DOCUMENTS**

ICO reports and related documents are due to the Division by January 31 and July 31. The ICO must submit the following documents electronically by the required due dates to be considered timely filed:

1. Summary of Test Results
2. Statement of Compliance
3. Sample Selection Documentation
4. ICO Reports
  - Part I
  - Part II
  - Part III
  - Part IV

The above documents are submitted electronically as word documents to the Division at [dor\\_coloradocasinos@state.co.us](mailto:dor_coloradocasinos@state.co.us). In the subject line of the email type ICO Report *Casino Name* January Year or ICO Report *Casino Name* July Year as applicable.

Each ICO report and related documents must conform to the following file name convention:

<b>Name of Document</b>	<b>File Naming Convention</b>
Summary of Test Results	ICO <i>Casino Name</i> Test Results January Year.doc or ICO <i>Casino Name</i> Test Results July Year.doc
Statement of Compliance*	ICO <i>Casino Name</i> Stmt of Compliance January Year.doc or ICO <i>Casino Name</i> Stmt of Compliance July Year.doc
Sample Selection Documentation	ICO <i>Casino Name</i> Sample Selection January Year.doc or ICO <i>Casino Name</i> Sample Selection July Year.doc
ICO Report	
Part I	ICO <i>Casino Name</i> Report Part I January Year.doc or ICO <i>Casino Name</i> Report Part I July Year.doc
Part II	ICO <i>Casino Name</i> Report Part II January Year.doc or ICO <i>Casino Name</i> Report Part II July Year.doc
Part III	ICO <i>Casino Name</i> Report Part III January Year.doc or ICO <i>Casino Name</i> Report Part III July Year.doc
Part IV	ICO <i>Casino Name</i> Report Part IV January Year.doc or ICO <i>Casino Name</i> Report Part IV July Year.doc

\*Since this document contains signatures, mail the hard copy to 1707 Cole Blvd, Suite 300, Lakewood, CO 80401 attention Chief Auditor, or the document can be imaged and emailed in accordance with the above instructions.

**FOLLOW-UP**

After the ICO completes and submits the required documents to the Division, the ICO must perform follow-up for noncompliance issues within two months of submitting the report to the Division. The ICO must document the follow-up on the ICO checklists by noting in the appropriate column (i.e., 2C or 2N) whether the noncompliance issue was in compliance or out of compliance at follow-up. The ICO must also document the date follow-up was performed. This documentation is retained at the casino.

**(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

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

**Note:** Part II of the ICO Report includes the Slot Machines ICMP section and related ICO checklist. See ICO Instructions for sample wording if 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.

### **Slot Machines**

#### **NONCOMPLIANCE ISSUE:**

1. A copy of each slot machine's respective par sheet, indicating the probability of hitting each award and the associated pay for each award available, must be maintained inside of each slot machine.

While checking for PAR sheets it was noted that machine 1006 did not have a copy of the game's PAR sheet inside the game.

#### **ICO RECOMMENDATION:**

The slot department was immediately notified and advised to get a replacement PAR sheet for the game. Each machine on the floor should be checked to ensure that the proper PAR sheet is maintained in the machine.

#### **MANAGEMENT RESPONSE:**

The slot department has been instructed to verify that PAR sheets are in each slot machine and that the PAR sheet corresponds to the current game. The slot department is to provide a written report to the ICO no later than MM/DD/YY with the results of their check and attestation that the correct PAR is being maintained in each machine.

#### **NONCOMPLIANCE ISSUE:**

2. A progressive jackpot log must be maintained for all progressive banks. This log reflects the licensee name, applicable month and year, and identification of the bank. The log must be used to record, on a daily basis, the amount of the progressive liability (the advertised jackpot, and any secondary jackpot progressive liabilities), as well as any primary and secondary handpay jackpots. Statewide progressives do not need to be logged.

Original log for *Month, Year* had been dropped in the accounting box instead of the copy. Accounting personnel did not transfer data from *Month 1<sup>st</sup>* to the 4<sup>th</sup> and get the original back to the floor. Progressive data is lost for the period of *Month 1 – 4, Year*.

#### **ICO RECOMMENDATION:**

Accounting personnel need to have further training on the necessity of reviewing progressive logs and ensuring that corrections are noted on the original logs when needed in addition to the copies reviewed daily.

#### **MANAGEMENT RESPONSE:**

The controller will be required to hold training session with accounting personnel on progressive logs.

**NONCOMPLIANCE ISSUE:**

3. CLGR 30-1230 states "A light must be installed on the top of the slot machine that automatically illuminates when the interior of the slot machine is accessed. Video bar top slot machines do not need a light, but must display a message on the screen indicating that a door is open. This provision, in whole or in part, may be waived by the Director." The top light on slot machine 11619 did not illuminate when the main door was opened.

**ICO RECOMMENDATION:**

The Slot Department Manager needs to ensure staff is checking slot machines for proper operation of required lights.

**MANAGEMENT RESPONSE:**

Slot Department Manager is currently setting up and scheduling floor person preventive maintenance along with the slot technicians doing their preventive maintenance on all games throughout the casino. In addition to this slot management will be walking the floor and addressing these types of maintenance issues. These issues will also be logged on the repair log that the slot technicians will be responsible for checking on a daily basis.

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

**Note:** Part III of the ICO Report includes the, TITO and EPCS 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.

**Ticket-In/Ticket-Out, Purchase Tickets & Slot Coupons**

**NONCOMPLIANCE ISSUE:**

1. Adjustments are defined as changes to system information made subsequent to the time of the event. Any corrections and/or adjustments made to ticket information must be supported by adequate documentation. In the case where reports are reprinted to reflect any corrections and/or adjustments made by accounting personnel (e.g., "final run" reports), corrected and/or adjusted information reflected on these final run reports is reviewed by someone other than the individual who made the correction/adjustment. This review is evidenced by the reviewer's initials and date of the review.

On the audit for ticket in for drop period ending MM/DD/YY, the auditor adjusted the actual tickets redeemed for two machines.

**ICO RECOMMENDATION:**

This is a training issue for the relatively new auditor. Recommend an intensive training session with the auditor.

**MANAGEMENT RESPONSE:**

The supervisor will provide training with necessary personnel.

**Electronic Promotional Credit Systems (EPCS)**

**NONCOMPLIANCE ISSUE:**

This section is not applicable. No further action necessary.

**ICO RECOMMENDATION:**

N/A

**MANAGEMENT RESPONSE:**

N/A

*(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 Repot 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.

**Keno****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.

**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.

**ICMP Compliance Checklist: Section 1, GENERAL**  
**For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

**Legend:**

**C** = In Compliance      **N** = Noncompliance      **2C** = In Compliance at Follow-up      **2N** = Noncompliance at Follow-up

Licensee Name	<b>Review Recap</b>		
Prepared By			
Period Reviewed (ICO Use Only)		Initial Review	Follow-up
Date & Time Completed	(1) Total items tested		
Date Follow-up Performed	(2) Total noncompliance items		

<b>DIVISION OF GAMING USE ONLY</b>			
Employee Signature & License #			
Casino Manager Signature & License #			

**COLORADO LIMITED GAMING ACT**

1. **CRS 44-30-820 Persons in supervisory positions – unlawful acts – rules.**

It is unlawful for a dealer, floorperson, or other employee who serves in a supervisory position to solicit or accept any tip or gratuity from a player or patron at the licensed gaming establishment where he or she is employed; except that a dealer may accept tips or gratuities from a patron at the table at which the dealer is conducting play, subject to this section. Except as the commission may authorize by rule, a dealer shall immediately deposit tips or gratuities in a lockbox reserved for that purpose, accounted for and placed in a pool for distribution based upon criteria established in advance by the licensed retailer. Interview the supervisors (e.g., pit boss, slot supervisor, etc.) to determine compliance with this requirement.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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2. **CRS 44-30-828 Detention and questioning of person suspected of violating article – limitations on liability – posting of notice. (Optional, but recommended)**

Display in a conspicuous place in the establishment a notice (signage) substantially saying, "ANY GAMING LICENSEE, OR ANY OFFICER, EMPLOYEE, OR AGENT THEREOF WHO HAS PROBABLE CAUSE TO BELIEVE THAT ANY PERSON HAS VIOLATED ANY PROVISION PROHIBITING CHEATING IN LIMITED GAMING MAY DETAIN THAT PERSON IN THE ESTABLISHMENT." Review the posted notice to determine compliance with this requirement.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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3. **CRS 44-30-829 Failure to display operator and premises licenses.**

- (1) It is unlawful for any person to fail to permanently display in a conspicuous manner:  
 (a) Operator and premises licenses granted by the commission;

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Revised July 2022  
 Effective November 2022

**ICMP Compliance Checklist: Section 1, GENERAL**  
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(b) A notice in bold-faced type that is clearly legible and in substantially the following form:

**IT IS UNLAWFUL FOR ANY PERSON UNDER THE AGE OF TWENTY-ONE TO ENGAGE IN LIMITED GAMING.**

(2) Any person violating this section commits a class 2 misdemeanor and shall be punished as provided in section 18-1.3-501.

Review the posted gaming license to determine compliance with this requirement.

**COLORADO LIMITED GAMING REGULATIONS (CLGR)**

**RULE 3 – APPLICATIONS, INVESTIGATIONS AND LICENSURE**

**1. CLGR 30-313 Licensed premises – location.**

- No limited gaming shall be conducted or permitted outside of the licensed premises.
- All persons participating in limited gaming must stand or sit within the licensed premises.
- No licensee shall permit any person to conduct or participate in limited gaming who is not within the licensed premises.
- All slot machines, table games and keno kiosks offered for use by the public, and all dealers and patrons playing such devices, must be located within the licensed premises. Review patron activity to determine compliance with these requirements.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**REQUIREMENTS FOR POSTED GAMING MAPS**

- (1) The licensee shall generate computer-derived maps for each floor of the casino, which shall be of a scale that is a minimum of 3/32 of an inch (3/32") to a foot. The maps shall assure accuracy of square footage calculations and visibly distinguish gaming areas from non-gaming areas. A map of a scale that is a minimum of 3/32" to a foot shall be available for inspection upon request by an employee of the Division. Review maps to determine compliance with this requirement.
- (2) As an alternative, the licensee can prominently post a copy of computer-derived maps, which measure at least 8 ½ by 11 inches for each floor of the casino. No fewer than one map per every 1,000 square feet of gaming area will be posted within or adjacent to the gaming area of that floor. The posted maps will be to proper scale and cannot be reduced to fit a smaller page or frame. Review posted maps to determine compliance with this requirement.
- (3) The following notice will be printed on, or posted adjacent to, each of the posted floor maps. "Shaded areas on this floor plan of the \_\_\_\_\_ Casino represent those areas licensed for limited gaming activities. Any person conducting or participating in

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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limited gaming must stand or sit within the licensed area as indicated on this map, under the rules of the Colorado Limited Gaming Control Commission.” Review posted maps to determine compliance with this requirement.

**2. CLGR 30-318 Licensed premises – modification.**

Any retail licensee may change the configuration of its licensed premises upon prior approval of the Division. Application to modify the licensed premises must be made on forms furnished by the Division. No application to modify the licensed premises of any licensee shall be approved unless the licensed premises as modified, meets all the requirements of article 30 of title 44, C.R.S., and the rules and regulations promulgated thereunder. (Note: The draft must be approved before changes to the licensed premises can be made.) Review last configuration change to determine compliance with this requirement.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**RULE 4 - RIGHTS AND DUTIES OF LICENSEES**

**1. CLGR 30-404 List of personnel.**

Prior to opening for business, a retail licensee must furnish to the Director on a form, or other medium required by the Division, a list of all persons, permanently or temporarily on property, licensed and unlicensed, including birth dates, employed by the retail licensee. Additionally, the retail licensee must by the first day of each month submit changes to its lists of employees, unless the Director, in writing, demands more frequent notification or allows less frequent notification. (Note: Gaming Industry Bulletin 39 has additional information on who is required to be included in the monthly submissions.) Review most recent Revenue Online submission and ensure recent employee changes were accurately updated to determine compliance with this requirement.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**2. CLGR 30-405 (5) Information to be furnished by licensee.**

All licensed manufacturers, distributors, operators, and retailers must report to both the local Division office and the Division’s Golden office on a form, or other medium, required by the Division, the movement of slot machines. This notification must be made by both the recipient and sender of the devices on a weekly basis identifying any movement of devices to and from any location for that week. Check the serial number on the slot machine device inventory spreadsheet submitted to the Division to the serial number on the slot machine. Perform this check on a minimum of 25 machines.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**3. CLGR 30-409 Support and key licensee identification.**

Every person licensed as a key or support licensee must wear in plain view identification issued by the Commission or Division. This section shall not apply to proposition players playing in poker games or to employees engaged in undercover security operations for the licensee, except that such licensees must have their license identification badges in their possession while working and must present them to division employees upon demand. Check to see if there are procedures in place to ensure employees do not work without a

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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valid gaming license.

**4. CLGR 30-414 Player rules.**

A retail licensee must post the following rules on the licensed areas (ensure posting by pit area, as well as other areas in the casino):

- a. Players and other persons present in the gaming area must be at least 21 years of age;
- b. No side bets are permitted;
- c. No credit may be extended;
- d. It is unlawful to claim unattended or unearned credits and money on gaming devices;
- e. It is unlawful to participate in limited gaming activities while intoxicated, and,
- f. Federal law prohibits the use of casino chips and tokens outside this establishment for any monetary purpose (i.e., rule must be posted at least at all cashier cages).

Review posted rules to determine compliance with this requirement.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**5. CLGR 30-417 Patron disputes.**

In a patron dispute, a licensee must notify the disputing patron that the patron has a right to contact the Division regarding the dispute. If a licensee refuses payment of alleged winnings to a patron, the licensee and the patron are unable to resolve the dispute to the patron's satisfaction, or the dispute involves at least \$1,250, the licensee must immediately notify the Division. The slot machine shall *not* be reset or altered (i.e. no further play) until a Gaming investigator has arrived (see Notification Requirements). Review most recent patron dispute to determine compliance with this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**6. CLGR 30-418 Special rules of conduct.**

A retail licensee may establish rules of conduct for players and spectators on its licensed site. Any such rules must be posted. The Director shall have the authority to immediately terminate any or all of such rules in any retail establishment.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**ICMP - GENERAL – C. OTHER MATTERS**

1. The most recent version of ICMP, CLGR and Act along with any approved variances must be made available at all times to all personnel. This information may be maintained electronically; however, in the event that the electronic format is not available the licensees must have a hard copy of the ICMP, CLGR, and Act along with any approved variances available and readily accessible in a designated area. Any approved variance must clearly indicate the Division's approval, including the approval date and indication of the individual(s) who approved the variance. Check to ensure a hard copy of the ICMP,

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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CLGR, and Act along with any approved variances is readily accessible in a designated area.

2. On the last day of each month, a licensee shall perform a device count of all devices on the floor. This count must include the count for slots and each table game type (e.g. Slots, Blackjack, Poker, Craps, Roulette, Baccarat, Big 6 Wheel, Casino War and Pai Gow) and must be electronically submitted into Revenue Online using the monthly device counts return, no later than the second day of the following month.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**ICMP - GENERAL – E. KEY EMPLOYEES**

1. For group A licensees – A keep employee is not required to be on the licensee’s premises at all times, but must be available at all times gaming is being conducted. Available as defined by the Division is able to be present on the licensee’s premises within fifteen (15) minutes of any request.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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For group B and C licensees – A key employee must be on the licensee’s premises at all times while open for the business of conducting limited gaming. For the purposes of this section, premise is defined as the gross building area as reflected on the casino’s gaming map. A key employee may go outside of the licensed premise within 5’ (five feet) of a door. For commonly owned casinos, physically connected by a wall with an opening between the casinos, key employees may go between the casinos.

Ensure the licensee has maintained compliance with this requirement.

**ICMP - GENERAL – H. GAMBLING PAYMENT INTERCEPT**

1. An IRS W-2G form is required if:
  - a. The winnings (not reduced by the wager) are \$1,200 or more from a slot machine,
  - b. The winnings (reduced by the wager or buy-in) are more than \$5,000 from a poker tournament,
  - c. The winnings for certain table games (reduced by the wager) are \$600 or more, and at least 300 times the amount of the wager,
  - d. The winnings (reduced by the wager) are \$1,500 or more from a keno game.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Prior to making a payment to a winner, the licensee shall obtain the name, address, and social security number of the patron from the W-2G, or a substantially equivalent form, to be filed with the United States Internal Revenue Service and submit the required information to the GPI registry operator. Note: In some circumstances, the registry needs to be searched only once per gaming day for a winning patron.

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Interview the licensee's front line employees to determine their understanding of this procedure.

**Searcher Requirement**

1. If the licensee is unable to access the registry for a period of 24-hours for any reason, the licensee must notify CI during business hours at 1-800-970-3468 ext. 0 or after business hours at Partnersupport@www.colorado.gov. If the outage continues for over 72 hours the licensee must notify the Division at dor\_coloradocasinos@state.co.us. During any acceptable period of inaccessibility of the registry to a licensee, the licensee may handle its payments to cash prize payment winners without recourse to the provisions of the Gambling Payment Intercept Act, except that the licensee must maintain a listing of cash prize payment winners during the inaccessibility period and maintain documentation explaining why the licensee was not accountable for the period of inaccessibility.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Interview the licensee's front line employees to determine their understanding of this procedure.

2. When an unclaimed jackpot is claimed by a patron the licensee must verify whether the taxable jackpot winner is listed in the GPI registry. When performing a search the licensee must enter the required information listed below:

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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- Social Security Number of Patron
- First Name of the Patron
- Last Name of the Patron
- Date of Birth
- Payout Amount (less taxes withheld if applicable)
- Reference Number

The licensee must enter a number in the reference field. The reference number may be the jackpot slip number, the W-2G number, or other number that will link the GPI Usage Report to the W-2G.

Verify that the required information is being entered when performing a search and ensure patrons who return to claim an unclaimed jackpot are searched prior to making a payment.

3. The licensee must check all last names provided by the patron and recorded on the form W-2G or substantially equivalent form, through the GPI database. The searcher will need to communicate through the outage/exception logs the need for multiple searches e.g., hyphenated or double surname) for a single W-2G transaction or omitted

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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searches (e.g. system outage) to accounting staff for the search report to reconcile to the number of W-2Gs issued.

The outage/exception logs must have the name of the casino, date, time, patron's name, reference number, jackpot amount, reason, initial and license number of employees. The outage/exception log must be submitted to accounting whenever an outage/exception occurs, and, at minimum, monthly.

Licensee must navigate the search database properly to arrive at the Print Receipt page when a search results in a match. Procedures must be in place to ensure the patron receives his/her Notice(s) of Intercept Receipt and Intercept Gambling Winnings Letter(s) and accounting receives the Gambling Payment Intercept Receipt(s).

Verify the licensee has written procedures in place, that they are being followed and that the outage/exception logs contain the information required by ICMP.

**Payer Requirements**

1. Upon verification that a cash payment winner is listed in the registry, the licensee must submit payment electronically to the registry operator in the amount intercepted by the end of the following business day. The licensee must have written procedures in place to verify all intercepts are identified and paid to the registry.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Verify the licensee has written procedures in place and that they are being followed.

**Administrator Requirements**

1. Information provided to and accessed through the registry is considered confidential. Licensees shall have written procedures in place to ensure the confidentiality of the information and to restrict access to the system to individuals with job duties that require access to the registry. Licensees shall not allow employees to share account sign-ons or passwords.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Check to see that written procedures are in place to restrict access. Verify that user and passwords are not being shared.

2. Each licensee must have an administrator, payer and searcher registered at all times. The licensee must also ensure that terminated employee (voluntary or involuntary) with access to the GPI application have their access disabled within three days of the employee's actual termination date. The three day window begins when the casino has constructive knowledge, either by the casino initiation or by the employee initiation

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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that the employee is no longer working at the casino. The actual termination date is when the casino notified the employee that he/she is terminated (three day window begins immediately), or the employee notified the casino of his/her last day (the three day window begins at the end of the shift on the last day).

Interview the licensee's Administrator to determine their understanding of this requirement.

**Accounting Requirements**

1. The licensee must have procedures in the Written Accounting Plan and written procedures for the applicable gaming departments/employees affected to ensure compliance with the Gambling Payment Intercept Act and Regulations.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Verify that there are procedures in place and that they are being followed.

2. A review of each gaming day's GPI activity must be completed on a timely basis, not to exceed four (4) days from the gaming date being reviewed. The licensee must be able to support and/or explain missed or excessive searches. At a minimum, the procedures must include reviewing the GPI system outage/exception logs, CI GPI Usage Reports, and W-2Gs or W-2G reports. Review documents and process to ensure compliance with requirements.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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3. The accounting department must complete and print a report, in Excel format, to include information from the GPI Usage Report and W-2G forms or W-2G report. The report must be completed by the licensee each month prior to submission of the monthly gaming tax return. This report is a summary of GPI activity for a one month period. Information included on this report is all data from the CI GPI Usage Report and the reference number linking to the W-2G. All W-2G forms issued by the licensee during the month must be reflected by a search on the CI GPI Usage Report. Any variances between the CI GPI Usage Report and the W-2G forms issued must be adequately documented and explained. Reconciling items may include multiple searches due to hyphenated, double surnames, or system outages.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Review documents and process to ensure compliance with requirements.

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**Additional Comments:**

**Review Recap**

*Initial Review*    *Follow-up*

(1) Total items tested                      \_\_\_\_\_                      \_\_\_\_\_

(2) Total noncompliance items                      \_\_\_\_\_                      \_\_\_\_\_

**ICMP Compliance Checklist: Section 2, TABLE GAMES**  
**For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

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Licensee Name	<b>Review Recap</b>		
Prepared By			
Period Reviewed (ICO Use Only)		Initial Review	Follow-up
Date & Time Completed	(1) Total items tested		
Date Follow-up Performed	(2) Total noncompliance items		

**DIVISION OF GAMING USE ONLY**

Employee Signature & License #

Casino Manager Signature & License #

**ICMP – TABLE GAMES - A. GENERAL**

Table games include but are not limited to Blackjack, House Banked Poker, Roulette, Pai Gow Tiles, Craps, Roulette, Big 6 Wheel and Baccarat.

- Licensees 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.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Licensee's must have procedures in place to mitigate the possibility of theft and/or cheating when special equipment or game pieces are associated with any table game.

Are there adequate procedures in place regarding the special equipment or game pieces? Check to see if procedures are being followed.

- Licensees must maintain an up-to-date and accurate list of the following information:
  - Each type of automatic shuffler and software operating on the shuffler device.
  - Each table game with a progressive, the progressive name, and the progressive software version operating in the pit.

The list must be maintained in the pit and available to the Division upon request. Ensure the list is maintained and contains up-to-date information.

**PIT AREA**

- The pit area is a restricted gaming area. Access to the pit area must be restricted to employees of the Pit Department. In addition, security and other authorized individuals may access the pit for the necessary conduct of gaming in the pit.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Interview the pit supervisor, table games manager, and dealer to determine their understanding of this requirement.

## ICMP Compliance Checklist: Section 2, TABLE GAMES

### For Use by Division of Gaming and Independent Compliance Officers (ICOs)

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2. 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 as 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.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Interview pit personnel to ensure they know the requirement and physically check the pit for extraneous items. Spot check dealers and/or pit supervisors to see if any have currency, chips or tokens in their pockets, other than their wallets or money clip. Ensure this requirement is met.

3. 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 a drop box must be replaced, procedures must ensure the contents of the replacement drop box can be combined and attributed to the individual table during the count. If the drop box cannot be repaired or replaced, the table must be closed until a functional drop box is available. Written policy must be provided to the Division upon request.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Interview pit supervisors to determine their understanding of this procedure.

#### PIT SUPERVISION

1. Adequate supervision of the table games pit 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.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Licensees offering table games must have a pit supervisor in the pit at all times when tables are open for play.

Is there a pit supervisor present when tables are open? Is the pit supervisor able to handle the demands of supervising the pit?

2. Licensees 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.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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3. Licensees must have a house policy for dealers/supervisors changing roles during a shift. The house policy must include receiving and distribution of tips. 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

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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posted house rules.

4. Licensees 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 to the shuffler must be maintained in the pit area.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**KEY CONTROL**

1. Separate locked areas in the pit shall be used to store all dice, tiles, cards and controlled forms issued by accounting. Controlled forms must not be stored with any other items. A separate locked box attached to each table is provided for dealer tips. Progressive controller and pit podium keys for card, tiles and dice storage are non-restricted keys. Access keys to these areas must be issued and controlled through the cage using key control logs or through an automated key tracking system (AKTS). See ICMP Section 10 Key Control for key control requirements.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Is the area in the pit that contains the controlled forms secured and locked at all times? Is a separate locked box attached to each table for dealer tips? Are keys issued and controlled using required key control? Do the pit supervisors have control of the keys they signed out?

**Table Games Bill Validators**

1. At times the BV is access to clear a jam, settle a patron dispute, or for other reasons. A BV stacker problem can be fixed by the licensed technician and a security person as long as the stacker contents are not accessed. If the stacker contents are accessed in order to fix the problem, the BV stacker remains in the pit. The process of fixing the BV and accessing the BV stacker contents is performed under surveillance in the pit. The licensed technician or gaming manager and security person shall remain with the BV stacker from the time it was removed until it is returned to the table or electronic betting terminal.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Interview staff and ensure they have adequate processes and knowledge about this process.

2. When the contents of the BV are access in order to clear a jam, settle a dispute, or for any other reason outside the BV drop and count process, the process of fixing the BV and accessing the contents may be performed under the following conditions:
- The gaming manager checks out the BV content key and proceeds to the device.
  - The licensee must ensure adequate camera coverage prior to accessing the BV funds. Surveillance coverage must be sufficient to identify the individuals accessing the funds, and when the funds are accessed. This may be accomplished through the use of a PTZ and/or stationary camera.
  - The BV problem is corrected in the presence of a licensed technician, security, and the gaming manager.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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## ICMP Compliance Checklist: Section 2, TABLE GAMES

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**Legend:****C** = In Compliance**N** = Noncompliance**2C** = In Compliance at Follow-up**2N** = Noncompliance at Follow-up

Interview staff and ensure they have adequate processes and knowledge about this process.

3. In case more than one BV needs to be repaired successively, the BV content key may be maintained between repairs; however, once the successive repairs are complete, the BV content key must be immediately returned by the gaming manager to Gaming Manager locked box #2 (box 2).

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Interview staff and ensure they have an adequate understanding about this process.

#### Table Games Access Control

1. An access log (log) must be maintained inside each Electronic Betting Terminal (EBT). An access log must be secured at a table unit with associated equipment. The handwriting must be legible and discernable to a person reviewing the log.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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If the licensee has EBTs on site, perform a random sample of EBTs and ensure the access log is present, handwriting is legible and discernable.

2. All logs must reflect the title of the form, licensee name and device number. Minimum required information for each entry is date, time, employee initials and license number of the individual accessing the device, and the reason for access. Entries are to be complete, accurate, and legible.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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When reviewing the logs, ensure the logs contain the required information and has been completed correctly.

3. Licensees must have procedures for documenting tilt resets which can be performed without accessing the interior of the device. Documentation must include the date and time, employee initials and license number, and reasons for the tilt. Entries shall be complete, accurate, and legible, and must be made available to the Division upon request. If an approved computerized system produces this information, including identification of the attending employee, the system report does not need to be initialed.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Ensure the licensee has procedures documented for the tilt reset process, and that all documentation contains the required information and has been completed correctly.

#### AUTOMATED PIT SYSTEMS

1. Prior to relying on a pit system, the licensee must test the system to ensure the system is properly communicating, functioning correctly and the information provided by the system is accurate and reliable. Did the licensee test the automated system prior to relying on the

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**ICMP Compliance Checklist: Section 2, TABLE GAMES**  
**For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

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**2N** = Noncompliance at Follow-up

system?

2. The licensee must ensure access to the pit system is authorized to appropriate individuals at appropriate levels to be consistent with a manual system.

C	N	2C	2N
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3. If the pit system goes down, the licensee reverts back to the manual process. Is the pit supervisor aware of how to generate a fill if the automated system goes down?

C	N	2C	2N
---	---	----	----

**ICMP TABLE GAMES - B. ADDITIONAL PAYOUT PROCEDURES**

1. Additional payouts may not alter any table games rules. The licensee must notify the Division, in writing, at least seven days prior to offering the additional payout program. Written notice must include:

C	N	2C	2N
---	---	----	----

- Description of additional payouts,
- Times and conditions necessary for additional payouts to occur, and
- Dates the additional payouts are effective.

Does the licensee offer additional payouts? Check to ensure the licensee received written approval from the Division prior to offering the additional payout program.

2. Each table offering additional payouts must be clearly marked.

C	N	2C	2N
---	---	----	----

Is each table that offers additional payouts marked as required?

3. Promotional awards must be made from a bank separate from the table tray banks and are not allowable deductions in calculating AGP.

C	N	2C	2N
---	---	----	----

Are promotional awards paid from a bank separate from the table tray bank?

**ICMP – TABLE GAMES - C. MANUAL FILL PROCEDURES**

1. Fill transactions are initiated by a pit supervisor prior to the issuance of fill slips and transfer of chips, tokens, and/or coins (hereafter, in all subsections, referred to as “chips”).

C	N	2C	2N
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The following procedures shall be performed when a manual fill is needed at a table game: (Request and observe a table fill).

- The pit supervisor determines that a table needs a fill.
- The pit supervisor obtains a Request For Fill/Credit slip (a two-part form stored in the locked pit podium), checks the fill box and completes the information on the slip.
- The pit supervisor signs the Request For Fill/Credit slip indicating accuracy of the slip and initiation of the fill process.

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- d. The pit supervisor calls a runner and the runner signs the Request For Fill/Credit slip, original (white) and copy (yellow) indicating receipt of the slip.
- e. The original (white) slip remains on the table.
- f. The runner takes the copy (yellow) of the Request For Fill/Credit slip to the cage to be processed.
  - i. The runner must be independent of the pit and cage.
- g. The cashier prepares the three-part Fill/Credit slip indicating the following information:
  - i. Date,
  - ii. Time,
  - iii. Shift,
  - iv. Game,
  - v. Table number,
  - vi. Dollar amount of chips by denomination, and
  - vii. Total fill.
- h. The cashier files the copies (yellow) of the Request For Fill/Credit and Fill/Credit slips until the end of the shift.
- i. The runner transports the chips and the original (white) Fill/Credit slip to the pit supervisor at the table as designated on the Fill/Credit slip and places them on the table next to the dealer.
- j. The dealer breaks down at least one stack from the highest denomination chips, verifies the chips, and counts them in full public view prior to placing them in the table tray.
- k. The pit supervisor verifies the fill amount by comparing the chips to the Fill/Credit slip and signs the Fill/Credit slip indicating the requested amount of chips was received and the accuracy of the slip.
- l. If there is a discrepancy between the fill amount and the chips received, the runner returns the chips and related slip to the cage.
- m. The dealer signs the Request For Fill/Credit and Fill/Credit slips indicating agreement between the slips and the receipt of the chips indicated on the slips.
- n. The dealer places the chips in the table tray.
- o. The dealer or supervisor deposits the original (white) Request For Fill/Credit and Fill/Credit slips in the table drop box.

Was the fill performed as required by the ICMP from the time the request for a fill was processed to the time the fill was completed at the table? Explain and detail all issues of non-compliance.

2. Does the pit supervisor obtain a request for fill slip, check the fill box and complete the information on the slip?

- |   |           |          |
|---|-----------|----------|
| a. Has the pit supervisor and the runner signed the request for fill slip?        | Yes _____ | No _____ |
| b. Was the white copy of the request slip placed on the table receiving the fill? | Yes _____ | No _____ |
| c. Does the runner transport the yellow copy of the request slip to the cashier?  | Yes _____ | No _____ |

**ICMP Compliance Checklist: Section 2, TABLE GAMES**  
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**2N** = Noncompliance at Follow-up

- d. Does the cashier prepare the three-part fill slip indicating the date, time, shift, game, table number, dollar amount of chips by denomination, and total fill? Yes \_\_\_\_ No \_\_\_\_
- e. Does the cashier sign all copies of the fill slip verifying the accuracy of the slip and the amount of chips? Yes \_\_\_\_ No \_\_\_\_
- f. Is the runner independent of the Pit Department? Yes \_\_\_\_ No \_\_\_\_
- g. Does the runner verify the chips and compare amount of chips to both slips? Yes \_\_\_\_ No \_\_\_\_
- h. Does the runner sign all three copies of the fill slip? Yes \_\_\_\_ No \_\_\_\_
- i. Does the cashier give the chips and the white copy of the fill slip to the runner? Yes \_\_\_\_ No \_\_\_\_
- j. Does the cashier keep the yellow copy of the fill slip? Yes \_\_\_\_ No \_\_\_\_
- k. Does the runner place the fill and white copy of the fill slip on the table receiving the fill? Yes \_\_\_\_ No \_\_\_\_
- l. Does the dealer break the chips down and verify by counting them in full public view? Yes \_\_\_\_ No \_\_\_\_
- m. Does the pit supervisor verify the fill and compare the fill to the fill slip? Yes \_\_\_\_ No \_\_\_\_
- n. Does the dealer verify the chips received to the amount requested? Yes \_\_\_\_ No \_\_\_\_
- o. Does the dealer sign both white copies of the request slip and the fill slip? Yes \_\_\_\_ No \_\_\_\_
- p. Does the dealer place the chips in the table tray? Yes \_\_\_\_ No \_\_\_\_
- q. Does the dealer drop both white copies of the slips in the table drop box? Yes \_\_\_\_ No \_\_\_\_

3. Cross-fills or even money exchanges between tables are prohibited.

C	N	2C	2N
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Interview the pit supervisor to determine their understanding of the prohibition.

**AUTOMATED PIT SYSTEM FILL PROCESS**

1. If the pit system electronically submits a Request For Fill/Credit to the cashier cage and the Fill/Credit slip is automatically generated in the cage, the Request For Fill/Credit slip is not required to be printed. The pit supervisor generates the request by entering the information into the terminal located in the pit. The Fill/Credit slips generated by the system are two-part forms with the copy (pink) retained in electronic fashion in the system. The Fill/Credit slip is processed the same as with a manual system with the original (white) going to the pit and deposited in the drop box and the copy (yellow) retained in the cashier cage.

C	N	2C	2N
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Observe or interview the pit supervisor to determine compliance with this procedure?

2. If a slip needs to be voided in the system, a pit supervisor is required to authorize the void in the system. If the pit supervisor is unable to authorize the void in the system, the Table Games Activity Log is used to document the authorization of the void. The documentation must include the date, slip reference, and signature of the pit supervisor authorizing the void. If the system does not print or generate a "void" slip, the cashier and a pit supervisor void the original slip using the void procedures detailed in the General section.

C	N	2C	2N
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Observe or interview the pit supervisor to determine their understanding of this procedure.

**ICMP Compliance Checklist: Section 2, TABLE GAMES**  
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**ICMP – GENERAL – D. Credit Procedures**

1. The following procedures apply when a manual credit is needed at any table game.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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- a. Credit transactions are initiated by the pit supervisor prior to the issuance of credit slips and transfer of chips.
- b. The pit supervisor determines there are excess chips in the table bank and the table needs a credit.
- c. The pit supervisor obtains a Request For Fill/Credit slip (a two-part form stored in the locked pit podium), checks the credit box, completes the information on the slip, and signs the slip indicating accuracy of the slip and initiation of the credit process.
- d. The dealer counts out the credit in full public view and signs the slip indicating the amount of chips agree to the Request For Fill/Credit slip.
- e. The pit supervisor calls a runner. The runner counts the chips to be credited and signs the Request For Fill/Credit slip indicating the amount of chips agree to the slip and receipt of the chips and slip.
- f. The original (white) slip remains on the table as evidence of the chips being transported.
- g. The runner takes the copy (yellow) of the Request For Fill/Credit slip and the chips to the cashier.
- h. The cashier prepares the three-part Fill/Credit slip indicating the following information:
  - i. Date,
  - ii. Time,
  - iii. Shift,
  - iv. Game,
  - v. Table number,
  - vi. Dollar amount of chips by denomination, and
  - vii. Total of credit.
- i. The cashier counts and compares the chips received with the amount recorded on the copy (yellow) of the Request For Fill/Credit slip and signs both the Request Slip and the Credit Slip indicating the slips agree and as evidence of receiving the chips.
- j. The runner verifies the information on the slips and signs the Fill/Credit slip from the locked dispensing machine.
- k. The copies (yellow) of the Fill/Credit slip and the Request For Fill/Credit slip remain in the cage.
- l. The runner takes the original (white) of the Fill/Credit slip to the table.
- m. The pit supervisor and the dealer verify the accuracy of the Fill/Credit slip and sign the slip indicating the slips agree.

**ICMP Compliance Checklist: Section 2, TABLE GAMES**  
**For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

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**2N** = Noncompliance at Follow-up

- n. The dealer or supervisor deposits both the Request For Fill/Credit slip and the Fill/Credit slip into the table drop box.

**AUTOMATED PIT SYSTEM CREDIT PROCESS**

1. If the licensee utilizes an automated pit system, the following procedures apply:
  - a. The pit supervisor enters the credit information into the computer terminal located in the pit area and a two-part Fill/Credit slip prints in the cage.
  - b. The pit supervisor notifies the runner that a credit needs to be transported. The runner must be independent of the pit.
  - c. The runner proceeds to the cage and picks up both parts of the Fill/Credit slip, original (white) and copy (yellow), and takes both copies to the pit.
  - d. At the pit, the dealer, pit supervisor and the runner verify the amount to be transported to the cage to the amounts listed on both parts of the Fill/Credit slip.
  - e. The dealer counts the credit in full public view.
  - f. The pit supervisor and dealer sign the original (white) and copy (yellow) of the Fill/Credit slip indicating the proper completion of the slip and verification of the slips.
  - g. The runner signs both copies of the slip indicating receipt of the chips.
  - h. The runner takes the funds and the Fill/Credit slip copy (yellow) to the cage.
  - i. At the cage, the cashier counts the funds received, and compares the counted amounts to the amounts listed on the Fill/Credit slip copy (yellow). If there is a discrepancy between the credit amount and the chips received, the runner returns the chips and related slip to the pit for reconciliation.
  - j. The cashier signs the copy (yellow) of the Fill/Credit slip indicating the chips received agrees with the slip and receipt of the chips while the runner observes the cashier's signing.
  - k. The copy (yellow) Fill/Credit slip is maintained by the cashier and included with the cashier's paperwork for the shift.
  - l. The pit is notified of the completed transaction at the cage and the dealer drops the original (white) of the Fill/Credit slip in the drop box while being observed by the pit supervisor.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**ICMP – TABLE GAMES - E. TABLE OPENING AND CLOSING PROCEDURES**

1. At the beginning and end of each shift, each table game tray must be inventoried by two licensed individuals, in each other's presence (one of which must be a pit supervisor) when the pit is open for any part of the 24 hour gaming day. The inventory is first documented on the two-part Opener/Closer Inventory Form, and then signed by both of the individuals performing the inventory. 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. If a pit system is utilized, the information is entered into the system after the inventory form has been completed and signed by both individuals. The closer is immediately dropped into the current shift's drop box

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**ICMP Compliance Checklist: Section 2, TABLE GAMES**  
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and the opener is dropped in the subsequent shift's drop box. If the licensee uses a multi-shift drop box, the drop box is switched to the next shift position in order to drop the opener. These procedures do not pertain to tables used for tournaments during the 24 hours gaming day.

Observe the opener/closer process and verify there is an actual count done for each table tray for each shift by both persons. Was the opener dropped immediately into the appropriate shift drop box?

**ICMP – TABLE GAMES - F. TABLE GAMES JACKPOT PAYOUT PROCEDURES**

When a player's hand results in a payout of \$600 or greater based upon odds of 300 to 1 or greater, a Table Games Jackpot Payout Slip must be completed and payment of the jackpot must be made from the cage and requires the gaming manager's approval. For further information, please refer to <http://www.irs.gov/>.

1. Was the table games jackpot performed as required by the ICMP from the time the request for a jackpot was processed to the time the jackpot was paid at the table? If there is no jackpot to observe, interview all relevant personnel. Explain and detail all issues of non-compliance.
  - a. The pit supervisor verifies the hand to determine the payout is needed.
  - b. The pit supervisor obtains the Request For Table Games Jackpot Payout Slip (a two-part form located in the locked pit podium, and completes the slip and signs the slip indicating proper completion of the slip and request of the funds.
  - c. The pit supervisor calls a runner who signs the original (white) slip and copy (yellow) indicating receipt of the slip. The runner must be independent of the pit.
  - d. A picture of the winning hand must be captured and generated through surveillance.
  - e. On the back of the picture, surveillance notes the game type, table number, player spot, and table games jackpot payout slip number.
  - f. Surveillance or security deposits the picture in the locked accounting box, or alternatively, the picture may be attached to the copy (yellow) of the payout slip in the cashier cage.
  - g. The runner transports the copy (yellow) Request For Table Games Jackpot Payout Slip to the cashier who prepares the three-part Table Games Jackpot Payout Slip indicating the following minimum information:
    - a. Date,
    - b. Time,
    - c. Shift,
    - d. Game type variation (e.g., Bonus 6, Three Card Poker),
    - e. Table number,
    - f. Amount of wager,
    - g. Winning hand (e.g., royal flush),

C	N	2C	2N
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Yes \_\_\_\_ No \_\_\_\_

Yes \_\_\_\_ No \_\_\_\_

Yes \_\_\_\_ No \_\_\_\_

Yes \_\_\_\_ No \_\_\_\_

Yes \_\_\_\_ No \_\_\_\_

Yes \_\_\_\_ No \_\_\_\_

Yes \_\_\_\_ No \_\_\_\_

**ICMP Compliance Checklist: Section 2, TABLE GAMES**  
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**2N** = Noncompliance at Follow-up

- h. Amount of jackpot payout,
- i. Taxes withheld,
- j. Gambling Payment Intercept withheld, if applicable and
- k. Total funds leaving the cage.

- h. The cashier counts the funds requested and signs the Table Games Jackpot Payout Slip indicating the slip agrees with the request slip and disbursement of the funds.
- i. The runner verifies the funds, compares the funds to the Table Games Jackpot Payout Slip, and signs the slip indicating the funds agree with the slips and receipt of the funds.
- j. The cashier dispenses the original (white) and copy (yellow) of the Table Games Jackpot Payout Slip from the locked dispensing machine. The copies (yellow) of the Request For Table Games Jackpot Payout Slip and the Table Games Jackpot Payout Slip are maintained in the cage.
- k. The runner transports the funds and the original (white) Table Games Jackpot Payout Slip to the pit supervisor at the table as designated on the slip.
- l. The pit supervisor verifies the Request For Table Games Jackpot Payout Slip with the Table Games Jackpot Payout Slip and the funds, and signs the payout slip indicating the funds agree with the request and receipt of the funds.
- m. The dealer verifies the jackpot payout received agrees to the amount requested and pays the patron.
- n. The dealer signs both the request and the payout slips indicating the funds agree to the request, receipt of the funds and payment of the funds to the patron. The patron signs the payout slip indicating receipt of the jackpot funds. The dealer or pit supervisor immediately deposits both the Request For Table Games Jackpot Payout Slip and the Table Games Jackpot Payout Slip into the table drop box.

Yes \_\_\_\_ No \_\_\_\_

Yes \_\_\_\_ No \_\_\_\_

Yes \_\_\_\_ No \_\_\_\_

Yes \_\_\_\_ No \_\_\_\_

Yes \_\_\_\_ No \_\_\_\_

Yes \_\_\_\_ No \_\_\_\_

Yes \_\_\_\_ No \_\_\_\_

**ICMP – TABLE GAMES – G. TABLE GAMES PERFORMANCE REVIEW**

- 1. A Table Games Activity Log must be maintained for all table games open for any part of a 24 hour gaming day. The log is used to record all events impacting the table. Such events shall include, but are not limited to, changes in the game rules, changes in the games offered for play, inclement weather, large payouts, suspicious activity of patrons, accessing bill validator cash can, patron disputes, changes in different game odds, and irregularities in inventory and drop procedures. The log must be forwarded to accounting at least monthly. A copy of the log must be maintained in the pit. Electronic table game unites and/or terminals must have system generated transaction logs.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Is there a log in the pit? Do the pit supervisors record activity on the log? Interview the pit supervisor to determine their knowledge regarding the log.

## ICMP Compliance Checklist: Section 2, TABLE GAMES

### For Use by Division of Gaming and Independent Compliance Officers (ICOs)

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2. The owner/operator, table games management, or licensee's equivalent, in conjunction with appropriate personnel, investigates any large or unusual fluctuations (as defined in the Written Accounting Plan) of the audited master games sheet, including a review of the daily hold percentage, for each table, for each shift. This review must be performed on a timely basis, not to exceed five (5) days from the gaming date being reviewed. When the pit is open for any part of the 24 hours gaming day, the table games activity log should be reviewed to determine if activity affecting hold percentage may be explained. The variance investigation may include a review of player activity, review of surveillance coverage, results of random dealer audits, etc. The results of these daily investigations for each table for each shift must be documented.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Are large or unusual fluctuations addressed in the Written Accounting Plan? Was the review performed on a timely basis; within five days from the gaming date being reviewed?

3. The daily investigations are used to support month end variance investigations by game type on the table games statistical reports. Results of the month end variance reviews by game type must be documented in accordance with the adequate explanation criteria described in the Accounting ICMP and submitted to the accounting department prior to the accounting department's submission of gaming taxes.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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4. Licensees must have a process in place to escalate month-end variance reviews for games types performing at unusual hold percentages for two or more consecutive months. The procedures employed must be included in the licensee's Written Accounting Plan.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Are these procedures addressed in the Written Accounting Plan? Interview pit personnel to determine if they are familiar with this requirement.

### **ICMP – TABLE GAMES – I. TABLE GAMES PROGRESSIVE PROCEDURES**

#### **GENERAL**

1. Each progressive table game must be linked to a meter showing the "advertised amount," and the "advertised amount" must be visible to all players who may potentially win the progressive jackpot. Ensure this requirement is met. The licensee offering the progressive must establish key control procedures to prevent unauthorized access to the progressive controller ensuring no one person has access to the controller or server configuration data.
2. The progressive controller must continuously monitor each linked table for Coin-In, must calculate the incrementation to the progressive jackpot and update the progressive jackpot display. It is the casino's responsibility to test this functionality prior to allowing patron play, to ensure incrementation and mathematical accuracy. Ensure this requirement is met.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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## ICMP Compliance Checklist: Section 2, TABLE GAMES

### For Use by Division of Gaming and Independent Compliance Officers (ICOs)

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**2N** = Noncompliance at Follow-up

3. A Table Games Progressive Jackpot Log must be maintained for all progressives. This log is used to document the progressive liability/meter for the beginning and end of each gaming day, the (progressive drop) coin-in hard meters by table for the beginning and end of each gaming day when the pit is open for any part of the 24 hour period, the (progressive drop) coin-in hard meters by table for the beginning and end of each gaming day when the pit is open for any part of the 24 hour period, the displayed jackpot amount at the time the end of day meters are read, and all progressive jackpots paid. All log entries must be complete, legible and accurate. Explanations for all decreases in the hand pay jackpot amounts must be documented. At the end of each gaming day when the pit is open for any part of the 24 hour period, the pit manager or designee ensures all required information is recorded on the log and the completed log is forwarded to accounting. Additionally, for each gaming day when the pit is open for any part of the 24 hour period, the pit manager or designee generates the following computer reports: A report showing activity on the game, a report showing (progressive drop) coin-in, and a report of jackpot payouts on the game. The reports are forwarded to accounting by placing them in the locked accounting box. A table games progressive jackpot log is not required if the licensee pit system tracks the table games progressive jackpots. Ensure this requirement is met.

C	N	2C	2N
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#### MALFUNCTIONS

1. Every progressive table and corresponding computer must be connected to an uninterrupted power supply (UPS). Ensure this requirement is met.
2. In the event of a malfunction of the table controller or the computer, the progressive feature must be disabled. The licensee may continue the game if there is a method to prevent the progressive wager. Licensees must document malfunctions on the table games activity log. Ensure this requirement is met.

C	N	2C	2N
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C	N	2C	2N
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#### PAYOUT

1. When a patron wins a progressive, the casino will verify the win. Once confirmed, a Request for Table Games Jackpot Payout Slip and a Table Games Jackpot Payout Slip will be completed. A W-2G may need to be completed, refer to the guidelines established by the IRS, <http://www.irs.gov/>, additionally, Gambling Payment Intercept procedures may apply. Ensure these requirements are met.
2. An optional progressive wager is considered for the calculation of AGP. In turn, when the progressive is awarded, the entire amount is deductible. Ensure this requirement is met.

C	N	2C	2N
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C	N	2C	2N
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#### ICMP – TABLE GAMES –J. NON-CASHABLE CHIPS

##### GENERAL

**ICMP Compliance Checklist: Section 2, TABLE GAMES**  
**For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

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**2N** = Noncompliance at Follow-up

1. Non-cashable chips are issued by the licensee for gaming in the table games of Blackjack, House Banked Poker, Craps and Roulette as indicated in the house rules. Non-cashable chips are only redeemable in the form of a wager at the table. Non-cashable chips are not allowed to be utilized in Player Banked Poker tables/games. Non-cashable chips represent a wager and will be paid according the value on the chip and the odds of the table game type.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

Interview table games personnel to ensure their understanding of this requirement.

2. Non-cashable chips are not redeemable for cash, and must be played until a win/loss decision at which time the non-cashable chip is immediately dropped in the table drop box and is recorded as drop. At no time shall non-cashable chips be maintained in table trays as part of the inventory.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Interview table games personnel to ensure their understanding of this requirement.

3. Non-cashable chips may be stored in the pit, in a separate locked area, when being used for a current promotion. Procedures must be written to ensure proper inventory and security of the chips during the promotion. Procedures must be submitted, in writing, to the Division at least seven days prior to the start of the promotion. A copy of the approved procedures must be maintained in the pit area during the promotion. Non-cashable chips cannot be accepted for a tip wager or as a tip. Ensure these requirements are met.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**ICMP – GENERAL - D. INTERNAL CONTROLS & THE CONTROL ENVIRONMENT**

1. Pursuant to CLGR 30-1610(2), each licensee shall establish its own internal control procedures including accounting procedures, reporting procedures, and personnel policies for the purpose of determining the licensee's liability for taxes, fees, and exercising effective control over the licensee's internal fiscal affairs. The licensee's procedures must incorporate the ICMP requirements as established by the Division, or alternative requirements approved by the Division.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Ensure that approved ICMP variances for table games are located in the pit area for easy reference.

**COLORADO LIMITED GAMING REGULATIONS (CLGR)**

**RULE 4 RIGHTS AND DUTIES OF LICENSEES**

1. **CLGR 30-414 Player rules**

A retail licensee must post the following rules on the licensed areas:

- a. Players and other persons present in the gaming area must be at least 21 years of age;

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Revised November 2022

Effective November 2022

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- b. No side bets are permitted;
- c. No credit may be extended;
- d. It is unlawful to claim unattended or unearned credits and money on gaming devices;
- e. It is unlawful to participate in limited gaming activities while intoxicated, and
- f. Federal law prohibits the use of casino chips and tokens outside this establishment for any monetary purpose.

Is the required signage posted in licensed areas?

**2. CLGR 30-418 Special rules of conduct**

A retail licensee may establish rules of conduct for players and spectators on its licensed site. Any such rules must be posted. The Director shall have the authority to immediately terminate any or all of such rules in any retail establishment. If the licensee has such rules, are the rules posted?

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**RULE 8 RULES FOR BLACKJACK**

**1. CLGR 30-801(2) Blackjack (21) Rules.**

If a player has a disability which prevents such player, or a dealer, from complying with every provision found in Rule 8, the retail licensee shall be permitted to make reasonable accommodations to the disabled player, even if in apparent violation of Rule 8. Such reasonable accommodations shall not promote cheating, fraudulent acts, nor the use of unauthorized devices by any person.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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If the licensee offers such accommodations, do the accommodations meet the requirements?

**2. CLGR 30-803(1) Blackjack table - physical characteristics.**

Blackjack must be played at a table having on one side places for not more than seven players and on the opposite side, a place for the dealer. Blackjack played in an electronic setting must have the configuration, placement of the machines, number of dealers and maximum numbers of players approved by the Division Director or designee.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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A blackjack table, while in play, must have a chip tray, a discard rack, a drop slot and drop box, and a tip box, except that no tip box shall be required if tips are not accepted at the table. The table may have a no-peek device. Blackjack tables must have an identifying number, assigned by the retail licensee, on the top surface of the table or a table accessory. This table number must be visible to surveillance personnel and must be able to be captured on surveillance video of table activity.

Electronic blackjack tables must have a drop slot and drop box or bill validator, and ticket printer. A blackjack table which uses digital cards or digital representations of cards is not required to have a discard rack. A blackjack table which uses digital chips or digital representations of chips is not required to have a chip tray. A blackjack table capable of

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electronic tipping is not required to have a tip box. Blackjack tables must have an identifying number, assigned by the retail licensee, on the top surface of the table or a table accessory. This table number must be visible to surveillance personnel and must be able to be captured on surveillance video of table active.

Do the tables meet the specified requirements?

**3. CLGR 30-803(2) Physical characteristics.**

The layout must have specific areas marked in which to place wagers, and may have imprinted on it the name and logo of the establishment. A layout used for an approved variation game may have additional markings which identify the game, the holder of intellectual property rights to the game, the distributor of the game, any special markings needed for play of the game, and any other markings approved by the Director or Director's designee. A blackjack table that uses electronic betting terminals (EBTs) will have the wager areas and any special markings needed for play of the game included on the electronic screens.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Do the tables meet the specified requirements?

**4. CLGR 30-803(3) Blackjack table - physical characteristics.**

The following notices shall appear either on the table layout, table signage or EBTs clearly visible to every player at the table:

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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- a. One of these statements, in substantially this form:
  - i. "Dealer must draw to 16 and stand on all 17's," or alternatively,
  - ii. "Dealer must hit to soft 17".
- b. On blackjack tables used for games other than face up blackjack, the following notices shall appear in substantially this form:
  - i. "Blackjack pays 6 to 5" (substitute higher odds according to fact); and
  - ii. "Insurance pays 2 to 1," (substitute higher odds and restrictions on insurance according to fact).
- c. Minimum and maximum table betting limits, and if applicable, minimum and maximum table betting limits for special circumstances.
- d. A statement that players may request a copy of all blackjack rules.
- e. If applicable, any restrictions on surrender.
- f. If applicable, any restrictions on doubling down.
- g. If applicable, any restrictions on splitting aces or the number of cards which can be drawn to split aces.
- h. If applicable, any special payment schedule or payoff odds.
- i. Any restrictions on dealer tip wagers must be posted at the table or as wall signage.

Notice of the provisions of (3)(d) through (3)(i), above, if applicable at all times at every blackjack table offered by the retail licensee, may be provided by wall signage meeting the requirements of regulation 30-804, rather than by table signage.

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Do the tables meet the required specification?

5. **CLGR 30-804 Posting and furnishing of rules.**

Posted house rules and house rules governing play of blackjack must be clear and legible and posted in conspicuous and conveniently accessible locations available to all players in the blackjack area. The rules and the place of posting must be approved by the Director or Director's Designee. Printed copies of the house rules and rules of play must be provided to any player upon request.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Are the rules posted and available to the patrons?

6. **CLRG 30-805 Dealing shoes and shuffling devices.**

A dealing shoe must be designed and constructed to maintain the integrity of the game. Dealing shoes and shuffling devices in the establishment must be inspected each gaming day before cards are placed in them to ensure that the shoe or other device is not damaged, is operating properly, and has not been compromised in any manner which might affect the integrity of the game.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Interview pit staff, to determine their understanding of this rule and verify the devices are inspected each day.

7. **CLGR 30-806(2) Cards.**

A standard blackjack deck shall contain 52 cards in four suits (hearts, diamonds, clubs, and spades) with each suit consisting of numerical cards from 2 to 10 and a jack, a queen, a king, and an ace. Two or more decks of cards may be combined for play at blackjack. Observe a dealer inspecting a deck of cards used at the table to determine if the deck contains all the required cards.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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8. **CLGR 30-806(3) Cards.**

If permitted or required by the rules of a blackjack variation game, a joker may be added to make a 53 card deck, and two or more such decks may be combined for play of the game. One or more jokers may be added to a deck, or combination of decks, for a short term promotional play with the advance approval of the Director or Director's designee. When jokers are in use, the licensee must provide signage describing the card value(s) or usage of the jokers. Interview a pit supervisor to determine if this rule applies and verify the decks used are in compliance with this rule.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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9. **CLGR 30-811 Handling of wagers.**

Except for splitting pairs, surrendering, making an insurance wager, and doubling down, once the first card of the hand has been received by the first player to receive a card, no player may

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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handle, remove, or alter any wagers that have been made until the hand has been completed. After a wager on the insurance line, surrender, a wager to double down, or a wager to split pairs has been confirmed by the dealer, no player may handle, remove, or alter the wagers until the player's hand has been settled by the dealer.

Interview the pit staff to determine their understanding of this rule.

**10. CLGR 30-815 Inspection and presentation of cards.**

- a. After receiving the cards at the table, the dealer must sort and inspect the cards. The dealer must ensure that the decks are complete and that no cards are flawed, scratched, or marked in any way.
- b. The dealer must spread out the cards, faced upward on the table, by deck, according to suit, and in sequence, in such a manner that each individual card can be identified. The casino surveillance system shall video record this process.
- c. The dealer must inspect, present, shuffle, and place the cards into a shoe, if a shoe is to be used, only at the blackjack table where the cards will be dealt.
- d. Any time cards have been removed from the playing surface of a blackjack table and are subsequently returned to any table for play, the dealer must re-inspect and present the cards in the manner described above.
- e. Regulation 30-815 shall not be applicable to dealers who are dealing at blackjack tables which use the digital cards or digital representations of cards.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Observe the dealers to determine compliance with this rule.

**11. CLGR 30-816 (1) The Shuffle and reshuffle.**

Following presentation and inspection of cards, the dealer must turn the cards face downward on the table, mix them thoroughly using a "wash" or similar technique, shuffle them, and then stack them.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Observe a dealer to determine if they follow the proper procedure.

**12. CLGR 30-818 Procedure for dealing cards.**

Cards may be dealt either from the hand, from a dealing shoe specifically designed for the purpose and located on the table to the left of the dealer, or using the electronic dealing features of a table which uses digital cards or digital representations of cards. A dealer must remove cards, other than digital cards, from the shoe or the deck and then place them on the appropriate area of the layout. Where the dealer deals the cards by hand, the dealer must protect the deck to avoid exposure of the cards and may not fan the cards nor spread the deck while dealing.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Observe a dealer to determine if they follow the proper procedure.

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**13. CLGR 30-822 The pickup.**

- a. When the point count of a player's hand exceeds twenty-one, the player will reveal the hand and the dealer will immediately pick up the hand and place the cards in the discard rack. At the conclusion of a round of play, all cards on the layout must be picked up by the dealer, so that they can be readily arranged to indicate each player's hand in case of question or dispute. Each dealer must consistently pick up cards in only one direction during any shift. After the players' cards have been collected, the dealer must pick up the dealer's cards and add them to the stack of players' cards in such a manner that the dealer's cards will be located on the top of the discard stack when placed in the discard rack. After the pickup, all players' cards and the dealer's cards must be in the discard rack.
- b. When the dealer uses an approved shuffling shoe, the shuffling shoe shall serve as the discard rack.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Observe a dealer to determine the proper procedures are followed.

**14. CLGR 30-824 Prohibited acts.**

- a. No licensee or other person may remove, add, or alter any cards except as provided by this rule and no dealer or other employee of the retail license shall permit any person to engage in such activity.
- b. The dealer shall not look at, nor expose to any person, the face of a card before it is dealt.
- c. A player may not use any person, device, object, process, or procedure, other the player's own unrecorded mental acuity, which is designed or intended to:
  - i. Project the outcome of the game;
  - ii. To keep track of the cards played; or
  - iii. To analyze or predict the probability of the occurrence of an event relating to the game.
- d. Nothing in this section shall prohibit a player from using a strategy card, except when the retail licensee has posted notice prohibiting such use, pursuant to regulation 30-427.
- e. No dealer or pit supervisor shall advise a player about game strategy nor recommend the proper play of a hand while the player has a wager still pending on the outcome of the hand.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Interview a dealer to determine their knowledge of this rule.

**15. CLGR 30-828 (1) Irregularities.**

When any dealing irregularity occurs, the dealer shall notify the pit supervisor, who shall direct the dealer to take the proper corrective action, and shall observe such action being taken. The pit supervisor, and not the dealer, must make all decisions concerning disputed

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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play or payment or collection of wagers. If an irregularity occurs which is not described below, the pit supervisor shall determine the most appropriate action which the supervisor believes to be fair and equitable. Such action may include voiding a player's hand by calling it a push, or voiding the hand for all players at the table by calling every hand a push. If an irregularity occurs at a blackjack table which uses digital cards or digital representations of cards and the electronic features of the game do not permit the irregularity to be handled as provided below, the pit supervisor shall determine the most appropriate action which the supervisor believes to be fair and equitable.

Does the pit supervisor follow the specific actions to be taken in decisions made in 2 - 11 of this regulation? Are the dealers requesting the assistance of the pit supervisors regarding irregularities? Does the pit supervisor rely on the dealer to make the calls on the tables?

**16. CLGR 30-831 Procedure for accepting cash at blackjack table.**

A dealer who receives currency or coins, tickets, purchase tickets, table game coupons or Mobile ATM receipts ("cash") from a player at a blackjack table in exchange for chips or coins must do the following:

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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- a. The cash must be spread on top of the blackjack table by the dealer accepting it, in full view of the player. The gaming system must validate the ticket from the ticketing validation unit;
- b. The amount of cash or the amount must be stated by the dealer accepting it; and
- c. Immediately after an equivalent value of chips, tokens, electronic chips or coins has been given to the player, the cash must be taken from the top of the blackjack table and placed by the dealer into the drop box, except that quarters and half dollar coins may be placed in the chip tray.
- d. For blackjack, currency, valid tickets, valid purchase tickets, table games coupons, and mobile ATM receipts are inserted into the bill validator drop box. Tickets and purchase tickets must be redeemed before making any wager.

Observe a dealer to determine if the proper procedures are followed.

**17. CLGR 30-899.01 The play – Multiple action blackjack.**

- a. Except as provided by this Rule 30-899.01, multiple action blackjack shall follow all rules for blackjack play set forth by this Rule 8.
- b. A player may wager on any one, two, or three hands. Bets do not have to be equal; the initial bet on each hand played may not exceed the maximum wager limit determined by the house and in accordance with applicable law. Wagers on all hands to be played must be placed before first hand is dealt.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Observe the play of multiple action blackjack to determine if play is in accordance with the rule.

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**RULE 10 RULES OF POKER**

1. **30-1033 Posting of rules.**

Posted house rules and jackpot award rules shall be clear and legible and placed in a conspicuous and conveniently accessible location available to all players in the poker room. Rules posted and the place of posting must be approved by the Director or the Director's designee. Printed copies of house rules and jackpot award rules must be provided to players upon request.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Verify rules are posted and available to patrons.

2. **30-1044(2)(c) Poker tournaments**

Licensees participating in a tournament shall ensure that no player is entered in the tournament more than once at any given time during the tournament. However, if permitted by the tournament rules, after a player has been eliminated from the tournament, the player may be allowed to re-enter the tournament as a new and separate entry. Any player found to have two or more concurrent, active entries in a tournament shall be disqualified from tournament play and shall not be eligible to receive any tournament prize.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Interview pit personnel to determine their understanding of this rule.

3. **30-1045.06 Entry fee and player buy-in.**

a. Neither the amount of the tournament entry fee nor the amount of all allowable player buy-ins may exceed \$100,000. If both entry fees and buy-ins are used, then the combined amount of both the entry fee and all allowable buy-ins shall not exceed \$100,000.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Interview pit personnel to determine their understanding of this rule. Review the paperwork for the last tournament to determine if entry fees or buy-ins exceeded the allowable amount.

All buy-ins for the tournament are combined to create the tournament prize pool. The licensee may create a prize pool for each event provided that any funds are not awarded from that prize pool are carried forward to and awarded in future events of the tournament.

All buy-ins collected must be paid out to the winners of the tournament or events by the conclusion of the tournament. The licensee may not retain any amount collected as buy-ins. The licensee is allowed to offer complimentary buy-ins provided the dollar value I added to the prize pool. If the buy-in is a non-cash item such as a toy, food card, canned good, etc., the licensee must establish a pre-determined cash value (equivalent

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to the cash buy-in for the event) of the items and record the value as the buy-in on the required tournament form.

Licensees may offer at the end of an event a prize voucher that can be used to enter future events within the same tournament. If the prize voucher is used as an entry fee and buy-in at the future event in which an entry fee and buy-in are offered, the entry fee value from the voucher and the buy-in value of the voucher shall be documented on the required tournament form. The prize voucher shall be considered a prize pay out and shall be documented on the prize pay out form required by the Division.

If the prize voucher is used to guarantee a spot in a future event in which no entry fee and buy-in are offered, the prize voucher shall be considered a buy-in and applied to the prize pool. In this situation, the prize voucher is not considered a prize pay out.

Prize vouchers may only be redeemed by the patron that won the voucher in a previous event.

Interview pit personnel to determine their understanding of this rule. Review the paperwork for the last tournament to determine compliance with this rule.

**RULE 12 GAMING DEVICES AND EQUIPMENT**

**1. CLGR 30-1201(1) Device and equipment approval**

- a. No slot machine, bill validator, token acceptor, coin acceptor, hopper, ticketing (TITO) system, progressive controller, gaming system, table game with electronic or electromechanical components, mechanical or electronic shuffling device, chips, tokens, or other gaming equipment may be used for limited gaming purposes by any licensee without prior written approval of the Division. The approval must describe with particularity the equipment or device approved.
- b. Each individual slot machine, table game (electronic for physical), and all associated equipment must be inspected for proper settings/optioning/rule text (as applicable) by the offering retailer or operator before it is used for limited gaming. This shall include inspection of all required documentation on Division approved forms or proper completion. Each licensed manufacturer, distributor, associated equipment supplier, operator or retailer will be required to ensure that all component parts, media storage devices and slot machines shipped and offered for play in the State's limited gaming areas are approved for use in the State of Colorado.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Have all games been approved by the Division? Is all gaming equipment in good working order?

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Verify that the Division's written approval has been provided to the casino by the shuffler manufacturer for all shufflers and shuffler software used by the casino.

**RULE 21 RULES FOR BLACKJACK-POKER COMBINATION GAMES**

1. **CLGR 30-2102 Applicability of blackjack and poker rules.**

Except as otherwise provided by the specific rules of play of a game authorized in Rule 21, the standards rules of blackjack found in Rule 8, "Rules for blackjack," shall be applicable to play of the blackjack element of combined games and the standard rules of poker found in Rule 10, "Rules for Poker," shall be applicable to play of the poker element of combined games. Interview pit personnel to determine their understanding of this rule.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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2. **CLGR 30-2103 Minimum procedures.**

Unless otherwise described by this Rule 21, the Division shall determine if the predominant game being offered is blackjack or poker.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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a. If a game is determined to be predominantly blackjack, then the retail licensee offering the game shall enumerate it as a blackjack game and shall consider it a blackjack game for all accounting purposes. The provisions of Rule 9, "Minimum Procedures for Drop, Count, and Distribution of Chips and Coin for Blackjack, Craps and Roulette" shall apply to table management of the combined game.

b. If a game is determined to be predominantly poker, then the retail licensee offering the game shall enumerate it as a poker game and shall consider it a poker game for all accounting purposes. The provisions of Rule 11, "Minimum Procedures for Drop, Count, and Purchasing Chips for Poker," shall apply to table management the combined game.

Interview pit personnel to determine their understanding of this rule.

**RULE 22 RULES FOR ROULETTE**

1. **CLGR 30-2205 Rotation of wheel and ball**

a. The roulette ball shall be spun by the dealer, or approved electronic device, in a direction opposite to the rotation of the wheel and shall complete at least four (4) revolutions around the track of the wheel to constitute a valid spin.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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b. Prior to the ball coming to rest in a compartment, the dealer shall call "no more bets" and wave a hand over the layout.

c. Upon the ball coming to rest in a compartment, the dealer shall announce the number of such compartment and shall place a point marker known as a "crown" or "dolly" on that number on the roulette layout.

d. After placing the crown on the layout, the dealer shall first collect all losing wagers and then pay off all winning wagers.

Interview pit personnel to determine their understanding of this rule.

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**2. CLGR 30-2206 Irregularities**

- a. If the ball is spun in the same direction as the wheel, the dealer shall state “no spin” and shall attempt to remove the roulette ball from the wheel prior to its coming to rest in one of the compartments.
- b. If the roulette ball does not complete four revolutions around the track of the wheel, the dealer shall announce “no spin” and shall attempt to remove the ball from the wheel prior to its coming to rest in one of the compartments.
- c. If a foreign object enters the wheel prior to the ball coming to rest, the dealer shall state “no spin” and shall attempt to remove the ball from the wheel prior to its coming to rest in one of the compartments.
- d. If the ball leaves the wheel prior to the ball coming to rest, the dealer shall announce “no spin”. The ball shall be recovered and inspected by the pit supervisor for any damage or tampering before being placed back into the wheel.
- e. When any irregularity occurs, which is not described above, the dealer shall notify the pit supervisor, who shall direct the dealer to take the most appropriate action which the supervisor believes to be fair and equitable, and shall observe such action being taken. The pit supervisor, and not the dealer, must make all decisions concerning disputed play or the payment or collection of wagers.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Interview pit personnel to determine their understanding of this rule.

**3. CLGR 30-2208 Posting of rules.**

Posted house rules and jackpot award rules shall be clear and legible and placed in a conspicuous and conveniently accessible location available to all players in the room. Rules posted and the place of posting must be approved by the Director or designee. Printed copies of house rules and jackpot award rules must be provided to players upon request.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Ensure this requirement is met.

**4. CLGR 30-2212 Inspection and security procedures.**

- a. Prior to opening a roulette table for gaming activity, or at least once a gaming day for an open table, a key manager, licensed member of the casino security department, or pit supervisor shall:
  - i. Inspect the roulette table and roulette wheel for any magnet or contrivance that would affect the fair operation of such wheel;
  - ii. Inspect the roulette wheel to assure that it is level and rotating freely and evenly;
  - iii. Inspect the roulette wheel to assure that all parts are secure and free from movement;
  - iv. Inspect the roulette ball by passing it over a magnet or compass to assure its non-magnetic quality; and
  - v. Confirm that the layout and signage comply with 30-2210, if a double zero or triple zero roulette wheel is being used as a single zero roulette wheel.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**ICMP Compliance Checklist: Section 2, TABLE GAMES**  
**For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

**Legend:**

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Verify a key manager, licensed member of the Security Department or pit supervisor is inspecting the roulette table, roulette wheel, roulette ball, layout and signage for compliance.

- b. If a licensee uses a roulette wheel that has external movable parts, any adjustments to the movable parts shall be made by a key manager, licensed member of the casino maintenance department, slot technician member or pit supervisor in the presence of a licensed security department member. Adjustments to the movable parts of a roulette wheel that is located on the casino floor shall only be made:
  - i. When the game is not open to the public; and/or
  - ii. When the roulette wheel is moved to a secure location outside the casino floor as approved by the Director or designee.
- c. All adjustments shall be completed prior to the required inspections in 30-2212(1). The licensee may replace any of the movable parts at any time, provided, however, if any one or more of the movable parts are external, then an inspection must be completed by the Director or designee prior to reopening the roulette wheel and table for gaming activity. A log shall be maintained which shall include, at a minimum, the date, the roulette table number, whether an adjustment or replacement was completed and the name, license number and signature of the person making the adjustment or replacement.

Verify the licensee maintains a log listing the date, roulette table number, whether an adjustment or replacement was completed and the name, license number and signature of the person making the adjustment or replacement. Interview appropriate licensee personnel to verify compliance with this rule.

**RULE 23 RULES OF CRAPS**

1. **CLGR 30-2309 Retention and selection of dice.**

A set of at least five dice conforming to the specifications contained in 30-1280 shall be offered to each new shooter. Control of the dice at a craps table shall be the responsibility of the stickperson at the table. At the commencement of play, the stickperson shall offer the set of dice to the player immediately to the left of the boxperson at the table. If such a player rejects the dice, the stickperson shall offer the dice to each of the other players in turn clockwise around the table until one of the players accepts the dice. The first player to accept the dice when offered shall become the shooter who shall select and retain two of the dice offered. The remaining dice of the set shall be returned to the dice cup which shall be placed immediately in front of the craps stickperson. Interview appropriate personnel in the Table Games Department to determine compliance of this rule.

C	N	2C	2N
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2. **CLGR 30-2314 Posting of rules.**

Posted house rules and specific rules of conduct shall be clear and legible and placed in a

C	N	2C	2N
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conspicuous and conveniently accessible location available to all players in the room. Rules posted and the place of posting must be approved by the Director or designee. Printed copies of house rules and specific rules of conduct must be provided to players upon request. Ensure these requirements are met.

**COLORADO REVISED STATUTE**

1. **Section 44-30-818, C.R.S., Approval of rules for certain games.**

Specific rules for blackjack, poker, craps, and roulette shall be approved by the commission and clearly posted within plain view of such games. Are the rules posted in plain view?

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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2. **Section 44-30-820, C.R.S., Persons in supervisory positions – unlawful acts – rules.**

It is unlawful for any dealer, floorperson, or other employee who serves in a supervisory position to solicit or accept any tip or gratuity from a player or patron at the licensed gaming establishments where he or she is employed; except that a dealer may accept tips or gratuities from a patron at the table at which the dealer is conducting play, subject to this section. Except as the commission may authorize by rule, a dealer shall immediately deposit tips or gratuities in a lockbox reserved for that purpose, accounted for and placed in a pool for distribution based upon criteria established in advance by the licensed retailer. Note: A retail licensee may at its discretion utilize a tip storage device, commonly referred to as a token tube, for the purpose of temporarily securing chips received by dealers as tips (30-2317). Do supervisors accept tips or participate in the distribution of tips?

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**Additional Comments:**

Review Recap		
	<i>Initial Review</i>	<i>Follow-up</i>
(1) Total items tested	_____	_____
(2) Total noncompliance items	_____	_____

**ICMP Compliance Checklist: Section 3, PLAYER BANKED POKER**  
**For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

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Licensee Name	<b>Review Recap</b>		
Prepared By			
Period reviewed (ICO Use Only)		Initial Review	Follow-up
Date & Time Completed	(1) Total items tested		
Date Follow-up Performed	(2) Total noncompliance items		

**DIVISION OF GAMING USE ONLY**

Employee Signature & License #

Casino Manager Signature & License #

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

**ICMP – PLAYER BANKED POKER - A. GENERAL**

1. Licensees 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. Ensure this requirement is met.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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2. 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. Ensure this requirement is met.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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3. If a poker room maintains its own imprest bank than 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. Ensure this requirement is met.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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4. Lammers must be kept in a secure place accessible only to the persons who supervise the dealers. Ensure this requirement is met.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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5. 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. Ensure this requirement is met.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**ICMP Compliance Checklist: Section 3, PLAYER BANKED POKER**  
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6. 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. Ensure this requirement is met.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**POKER ROOM SUPERVISION**

1. 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. Ensure this requirement is met.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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2. Licensees offering table games must have a pit supervisor in the pit at all times when tables are open for play. Ensure this requirement is met.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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3. Licensees 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. Ensure this requirement is met.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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4. Licensees must have a house policy for dealers/supervisors changing roles during a shift. Review the licensee's house policy and ensure the procedures are followed.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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5. 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. Ensure this requirement is met.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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6. Licensees 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.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**PROPOSITION PLAYERS**

1. 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). Ensure this requirement is met.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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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

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Revised July 2021

Effective November 2022

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allowed to resume duties of a proposition player during the remainder of the shift. Ensure this requirement is met.

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

**ICMP – PLAYER BANKED POKER – B. JACKPOT AWARD PROCEDURES**

1. 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 jackpot award drop boxes are exchanged between shift changes. Jackpot award drop boxes must be clearly marked. Ensure this requirement is met.
2. Someone independent of the poker room must record the amount of the jackpot award liability on a daily basis on the poker jackpot log. The poker jackpot log must be forwarded to accounting at least once a month, and whenever a jackpot is awarded. Ensure this requirement is met.

C	N	2C	2N
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C	N	2C	2N
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**UPDATING THE JACKPOT AWARD**

1. 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. Ensure this requirement is met.

C	N	2C	2N
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**AWARDING THE JACKPOT**

1. 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. Ensure this requirement is met.
2. 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,

C	N	2C	2N
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C	N	2C	2N
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- h. Taxes withheld, and
- i. Net amount awarded to patron.

3. The pit supervisor signs both parts of the form indicating proper completion of the form and initiates the request for the funds. Ensure this requirement is met.

C	N	2C	2N
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4. 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. Ensure this requirement is met.

C	N	2C	2N
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5. 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. 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. Ensure this requirement is met.

C	N	2C	2N
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6. 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. Ensure this requirement is met.

C	N	2C	2N
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7. The patron signs the original (white) form upon payment of the award indicating receipt of the funds. Ensure this requirement is met.

C	N	2C	2N
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Once the jackpot is paid, the original (white) table games payout form is immediately deposited in the locked accounting box by the verifier. Ensure this requirement is met.

**ICMP – PLAYER BANKED POKER – C. POKER IMPREST EXCHANGE AND INVENTORY PROCEDURES**

1. 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 protection of assets and player funds. Ensure this requirement is met.

C	N	2C	2N
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**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.

1. 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.

C	N	2C	2N
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**ICMP Compliance Checklist: Section 3, PLAYER BANKED POKER**  
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- 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 marketing system, or the procedure itself used to exchange the funds mitigates the possibility of theft.

C	N	2C	2N
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**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 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.
- If 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. Ensure this requirement is met.

C	N	2C	2N
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C	N	2C	2N
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C	N	2C	2N
---	---	----	----

C	N	2C	2N
---	---	----	----

C	N	2C	2N
---	---	----	----

C	N	2C	2N
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**ICMP – PLAYER BANKED POKER – 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. Ensure each tournament has the corresponding paperwork and that it has been completed properly.
- 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. Ensure the inventory has been completed correctly.

C	N	2C	2N
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C	N	2C	2N
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3. 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.

C	N	2C	2N
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**ENTRY FEES AND BUY INS**

1. 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. Randomly select a tournament and ensure all entry fees were properly reported as adjusted gross proceeds.

C	N	2C	2N
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2. 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. Randomly select a tournament and ensure all buy-ins were paid back in their entirety to the players during the tournament.

C	N	2C	2N
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3. 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:
- Name of patron, and
  - Amount of the entry fee and/or buy-ins.

C	N	2C	2N
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Ensure the Table Games Tournament Entry Fee & Buy-In Log were completed properly.

4. 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. Randomly select a tournament and ensure one line was completed per patron.

C	N	2C	2N
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5. 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 or buy-in 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.). Review the tournament paperwork and ensure complementary and non-cash items are recorded in accordance with ICMP.

C	N	2C	2N
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6. All monies collected as entry fees and buy-ins are maintained in a secure manner and must not be commingled with other funds. Ensure this requirement is met.

C	N	2C	2N
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**ICMP Compliance Checklist: Section 3, PLAYER BANKED POKER**  
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7. When the entry fee/buy-in period closes, or at 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 and buy-in log, noting any variances. The two licensed employees sign the Table Games Tournament Entry Fee & Buy-In Log attesting to the amount collected and recorded. Ensure this requirement is met.

C	N	2C	2N
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8. 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 paperwork. Ensure this requirement is met.

C	N	2C	2N
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9. 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. Ensure this requirement is met.

C	N	2C	2N
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10. 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. Ensure adjusted gross proceeds was reported correctly and no losses were declared.

C	N	2C	2N
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**AWARDING PRIZES**

1. 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. Ensure this requirement is met.

C	N	2C	2N
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2. The pit supervisor or his/her designee completes the table games payout form which includes the following minimum information:

C	N	2C	2N
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- Date,
- Time,
- Shift,
- Table number,
- Seat number,
- Patron name,
- Patron's address,
- Dollar amount of prize (if merchandise, this is the cost of the item),

Revised July 2021

Effective November 2022

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**2N** = Noncompliance at Follow-up

- i. Description of award, including tournament description,
- j. Taxes withheld,
- k. Gambler 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.

Sample the table games payout forms and ensure they have been completed with the required information.

3. 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. Ensure this requirement is met.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**Additional Comments:**

**Review Recap**

*Initial Review*    *Follow-up*

(1) Total items tested                      \_\_\_\_\_

(2) Total noncompliance items                      \_\_\_\_\_

**ICMP Compliance Checklist: Section 4, SLOT MACHINES**  
**For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

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**2C** = In Compliance at Follow-up

**2N** = Noncompliance at Follow-up

<b>Licensee Name</b>	<b>Review Recap</b>		
<b>Prepared By</b>			
<b>Period Reviewed (ICO Use Only)</b>		Initial Review	Follow-up
<b>Date &amp; Time Completed</b>	(1) Total items tested		
<b>Date Follow-up Performed</b>	(2) Total noncompliance items		

**DIVISION OF GAMING USE ONLY**

**Employee Signature & License #**

**Casino Manager Signature & License #**

**ICMP - SLOTS - A. EQUIPMENT CONTROL/TESTING**

- Licensees are responsible for ensuring that all gaming devices being offered for use at its gaming establishments are secure, completely and successfully tested, and properly configured to comply with Colorado Rules and Regulations (CLGR). Licensees are also ultimately responsible for ensuring that all required program media used in its gaming devices are approved for use in Colorado. The same requirements apply to all gaming devices, irrespective of prior ownership or use, whether in or outside Colorado.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**SLOT DATABASE**

- Licensees must submit a current, complete and accurate slot floor database in a manner determined by the Division, once every thirty-day period. The slot floor database must have, at a minimum, the required information as displayed in the Slot Data Form found in the Forms section of Section 4 / Slot Machines. The required data field information in the slot floor database must be listed exactly as the Slot Data Form header text.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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All slot database files must be made available to Division staff immediately upon request.

**SLOT METERS**

- Soft and/or system (if applicable) meter readings must be taken for coin in, coin out, coin drop, bill in, attendant paid jackpot, attendant paid progressive payout, attendant paid cancelled credits, machine paid progressive payout, voucher in, voucher out, machine paid external bonus and attendant paid external bonus, cashable electronic promotion in, non-cashable electronic promotion in, and non-cashable electronic promotion out for each event listed in the ICMP. Meters are captured so proper statistical reports can be generated. Interview the licensee personnel responsible for meter readings to determine their understanding.
- Soft and/or system meter readings, whichever is applicable, must be recorded. To rely on system meter readings the machine must have passed testing and be communicating with the system. Meters must be recorded, prior to removing devices from the floor, prior to

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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	<b>N</b>	<b>2C</b>	<b>2N</b>
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Revised December 2020

Effective November 2022

## ICMP Compliance Checklist: Section 4, SLOT MACHINES

### For Use by Division of Gaming and Independent Compliance Officers (ICOs)

#### Legend:

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denomination changes, when devices are placed in service, when devices are taken out of service for any reason that would affect the meter retention (this is to ensure meters are accurately retained), when accessing the computer components of the slot machine, (which could cause any of the meters to reset, including, but not limited to, RAM clears), and when converting or re-configuring a machine. Note: The coin in meter for each progressive on a multi-game or multi-denomination slot machine must also be recorded in the above situations, with the exception of each drop. Interview the licensee personnel responsible for meter readings to determine their understanding of this procedure.

C	N	2C	2N
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3. All applicable soft or system meter information must be captured for each drop. For example, voucher in and voucher out do not need to be recorded for a non-ticketing machine. Meters are recorded for each machine on the gaming floor, including machines out of service. If meters cannot be recorded for machines out of service at the time of the drop, meters must be recorded prior to placing the machine in service. Interview the licensee personnel responsible for meter readings to determine their understanding of this procedure.

C	N	2C	2N
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#### MACHINE REMOVALS

1. Prior to removing a machine from the floor, the Slot Department must notify the Accounting Department, in writing, of the machine(s) being removed from the floor. Interview the licensee personnel responsible for machine removals to determine their understanding of this procedure. Review paperwork to determine if the required information is obtained.
2. The machine contents must be dropped in accordance with the emergency drop procedures outlined in the Table Games and Slot Drop and Count Procedures section. Interview the licensee personnel responsible for machine removals to determine their understanding of this procedure.

C	N	2C	2N
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C	N	2C	2N
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#### ICMP - SLOTS - B. MACHINE ACCESS

1. A slot machine access log must be maintained inside each slot machine. The handwriting must be legible and discernable to a person reviewing the log. Select a sample of machines and review the machine access log to determine compliance with this procedure.
2. A kiosk machine access log must be maintained inside each kiosk. The handwriting must be legible and discernable to a person reviewing the log. Select a sample of machines and review the machine access log to determine compliance with this procedure.
3. Each person who accesses a slot machine or kiosk for any defined event (as outlined in the ICMP) shall make an entry on the log. Interview the licensee personnel responsible for accessing slot machines and kiosks to determine their understanding of this procedure.
4. There only needs to be one description of any uninterrupted event on the log for each person involved in the resumed event and not for each opening of the door for each

C	N	2C	2N
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C	N	2C	2N
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C	N	2C	2N
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C	N	2C	2N
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## ICMP Compliance Checklist: Section 4, SLOT MACHINES

### For Use by Division of Gaming and Independent Compliance Officers (ICOs)

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person(s). No description is required when removing the BV stacker during drop. Interview the licensee personnel responsible for accessing slot machines and kiosks to determine their understanding of this procedure.

5. All logs must reflect the title of the form, licensee name and device number. Minimum required information for each entry is date, time, employee initials, and license number of the individual accessing the machine, and the reason for access. Entries are to be complete, accurate, and legible. Select a sample of machines and review the machine access log to determine compliance with this procedure.

C	N	2C	2N
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6. If a door is opened twice by the same individual during a hopper fill, the log may be signed once with an entry of "fill x2". If two individuals opened the door during a hopper fill, the log must be completed by each individual upon their respective access. Before locking the door, authorized staff may remove a coin from the hopper to play off the machine's tilt light. Interview the licensee personnel responsible for accessing slot machines to determine their understanding of this procedure.

C	N	2C	2N
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7. Licensees must have procedures for documenting tilt resets, which can be performed without accessing the interior of the machine. Documentation must include date, time, employee initials, employee license number, and reasons for the tilt. Entries shall be complete, accurate, legible, and must be made available to the Division upon request. If an approved computerized system produces this information, including identification of the attending employee, the system report does not need to be initialed. Interview licensee personnel responsible for tilt resets to determine their understanding of this procedure.

C	N	2C	2N
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8. The drop cabinet is the cabinet under the slot machine which contains the drop bucket or coins. If the slot machine does not operate with coin, the cabinet is considered a slot cabinet or may be referred to as a slot stand. At no point is it allowable to utilize the drop cabinet for storage when the machine is operated with coin or if the cabinet contains drop funds. A slot cabinet may be used as a storage area if it is not used to secure drop funds and must be keyed differently than a drop cabinet. Interview the licensee slot personnel to determine their understanding of this procedure. Select a sample of machines to verify compliance with this procedure.

C	N	2C	2N
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9. When it is necessary to perform maintenance on a drop cabinet, a security escort must be present to ascertain whether the drop cabinet contains coins. If it does, security must remain in the area and observe the maintenance procedure until maintenance is completed and the drop cabinet is locked, in order to verify and warrant the continued security of funds inside the cabinet. Interview the licensee slot and security personnel to determine their understanding of this procedure.

C	N	2C	2N
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10. At times the BV is accessed to clear a jam, settle a patron dispute, or for other reasons. The BV stacker problem can be fixed at the slot machine with the slot technician/attendant and security person present, as long as the stacker contents are not accessed. If the stacker

C	N	2C	2N
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## ICMP Compliance Checklist: Section 4, SLOT MACHINES

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contents are accessed in order to fix the problem, the BV stacker is taken to the cage by the slot technician/attendant and security person. The process of fixing the BV and accessing the BV stacker contents is performed under surveillance at the cage. The slot technician/attendant and the security person shall remain with the BV stacker from the time it is removed from the machine until it is returned to the machine. Observe or interview slot and security personnel to determine compliance and their understanding of this procedure.

11. Alternatively, when the contents of the BV are accessed in order to clear a jam, settle a dispute, or for any other reason outside the BV drop and count process, the process of fixing the BV and accessing the contents may be performed at the machine under the following conditions:

C	N	2C	2N
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- The gaming manager checks out the BV content key and proceeds to the slot machine.
- The licensee must ensure adequate camera coverage prior to accessing the BV funds. Surveillance coverage must be sufficient to identify the individuals accessing the funds and when the funds are accessed. This may be accomplished through the use of a PTZ and/or stationary camera.
- The BV problem is corrected in the presence of the slot technician/attendant, security, and gaming manager.

Observe or interview slot and security personnel to determine compliance and their understanding of this procedure.

12. In case more than one BV needs to be repaired successively, the BV content key may be maintained between repairs; however, once the successive repairs are complete, the BV content key must be immediately returned by the gaming manager to the gaming manager locked box #2. Observe or interview slot and security personnel to determine compliance and their understanding of this procedure.

C	N	2C	2N
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#### **ICMP - SLOTS - C. DEVICE REQUIREMENTS**

1. All gaming devices must be configured correctly to comply with CLGR. This includes the accurate setting of all device options, configurations, and real-time clock display. Interview slot personnel to determine the procedures in place are adequate to ensure compliance with this requirement.
2. Each gaming device must have a unique asset number associated with the gaming device. If the game theme, denomination or par is changed, a unique asset number must be assigned to the converted gaming device and all transactions properly associated to that new device asset number. Interview slot personnel to determine their understanding and compliance with this requirement.

C	N	2C	2N
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C	N	2C	2N
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## ICMP Compliance Checklist: Section 4, SLOT MACHINES

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3. A legible copy of each slot machine's respective par sheet, indicating the probability of hitting each award and the associated pay for each award available, must be maintained either inside each slot machine secured in its specific slot cabinet/stand or stored as an electronic file on a portable storage device maintained and secured by the licensee. Select a sample of machines to verify the par sheet is located within the machine or stored as an electronic file.

C	N	2C	2N
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4. The licensee must maintain a device history log for each gaming device, including ticket redemption kiosks that document information about, and changes or modifications to the device. This log may be secured inside each slot machine and kiosk or stored electronically on a portable device. Select a sample of machines and kiosks to verify the history log is available and complete.

C	N	2C	2N
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5. Licensees must have procedures in place which allows for the electronic version of the par sheets and device history logs to be maintained and secured on a portable device by the licensee. The procedures must also allow for the electronic files to be accessible to casino licensees, which can be viewed at each individual gaming device or kiosk immediately upon request by the Division.

C	N	2C	2N
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6. The BV release key must be keyed differently than all other slot machine doors. Request the BV release key and verify it is keyed differently by inserting the key into the various other slot machine door locks on a sample of different slot machines based on manufacturers.

C	N	2C	2N
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7. All slot machines shall be operated and stored in a secure manner to prevent unauthorized access to their contents and component parts. All spare component parts shall be stored in a secure location to prevent unauthorized access, tampering, or theft. Select a sample of machines on the floor to verify the security of the machine and component parts. Observe the storage area(s) for off floor machines and spare component parts to verify they are adequately secured.

C	N	2C	2N
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Pursuant to CLGR 30-1231 regarding the security of machine logic and memory devices, the phrase "secured in the machine" shall mean that the slot machine itself is to be considered a secured compartment and there need not be any other secured compartment within the slot machine itself that in which the internal logic is to reside to satisfy this regulation.

#### ICMP – SLOTS – D. DEVICE RECEIPT, REMOVAL, INVENTORY & DESTRUCTION

1. Slot machines may be stored on the casino premises or at an offsite location, as long as the Division knows the location of the machines, the storage facility is secure, and the licensee has properly reported the movement of those devices. Interview licensee personnel responsible for reporting device movements to determine their understanding of this procedure.

C	N	2C	2N
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2. Pursuant to Section 44-30-803 CRS, movement of any device to another establishment (e.g.,

C	N	2C	2N
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## ICMP Compliance Checklist: Section 4, SLOT MACHINES

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different licensee, on-site/off-site storage, etc.) must be reported to the Division. Please reference the Division's web-based device tracking system to comply with this requirement. All slot machines placed within approved designated gaming floor space areas (other than devices used for non-gaming, promotional purposes) must be reported to the Division as "on-floor" status in the Division's device tracking system. All slot machines placed outside of approved designated gaming floor space areas must be reported to the Division as "storage" in the Division's device tracking system. Slot machine destruction requirements can be found on the Division's web site at [www.colorado.gov/revenue/gaming](http://www.colorado.gov/revenue/gaming). Select a sample of machine moves to verify the information in Revenue Online is correct.

#### ICMP – SLOTS – E. TESTING

1. Coins needed to perform slot testing may be obtained from the hopper by authorized personnel. The access log must denote the number of coins removed from the hopper. Observe the process or interview slot and cage personnel to determine their understanding of this procedure.
2. Bills needed to perform any aspect of slot machine testing are disbursed from the cage as a miscellaneous disbursement. The machine numbers of the slot machines being tested must be documented in writing on the miscellaneous reimbursement. Observe the process or interview slot and cage personnel to determine their understanding of this procedure.
3. Once the machine testing has been completed, any funds remaining as a result of the testing must be receipted into the cage as a miscellaneous receipt, which must include a reference to the machine number. Observe the process or interview slot and cage personnel to determine their understanding of this procedure.
4. Bills from BV malfunctions (i.e., BV jams) obtained from the machine, must be receipted into the cage as a miscellaneous receipt. The miscellaneous receipt must also note the machine number. Alternatively, bill(s) from the BV jam can be returned to the BV stacker by following the procedures as listed under (B) Machine Access. Observe the process or interview slot and cage personnel to determine their understanding of this procedure.

C	N	2C	2N
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C	N	2C	2N
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C	N	2C	2N
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C	N	2C	2N
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#### ICMP – SLOTS – F. E-PROM DUPLICATION

1. Most manufacturers' software is protected by federal copyright and patent laws. Licensees must ensure that they are complying with all applicable laws when duplicating or using duplicated software.

C	N	2C	2N
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#### ICMP – SLOTS - I. JACKPOT PAYOUTS, ADDITIONAL PAYOUTS & SLOT FILLS

Jackpot payouts, as referred to in this subsection, include attendant paid jackpots, attendant paid cancelled credits, attendant paid progressive payouts, and attendant paid external bonus payouts.

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## ICMP Compliance Checklist: Section 4, SLOT MACHINES

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1. The design of slips for jackpot payouts, additional payouts and slot fills, is at the licensee's discretion. However, at a minimum, the payout form/documentation (minimum 2-part form from an automated gaming systems or cage system; 3-part form for a manual process) must meet the ICMP criteria. Review jackpot payout and fill slips and verify the required information is included on the slips.
2. Licensees who have received written approval from the Division for the use of its gaming system may process payouts of less than \$1,200 without a verifier. Processing of the jackpot payout without a verifier applies only to jackpot payouts recognized by the system that do not require an override or manual intervention. Jackpot payouts that require an override, an additional payout, or are not recognized by the system, must be processed with a licensed employee as the verifier. Observe the process or interview slot personnel to determine their understanding of this procedure.
3. Licensees who have received written approval from the Division for the use of its gaming system may process system generated payouts of less than \$5,000 during the time the patron is playing machine credits not associated with the specific payout amounts. If this process is used, a payout request form must be completed prior to resetting the machine and the patron must play off the machine. Observe the process or interview slot personnel to determine their understanding of this procedure, also verify the payout request forms meet the minimum standards as outlined in the ICMP.
4. Licensees must have written procedures that adequately prevent a patron from claiming a jackpot already paid or one in the process of being paid. Procedures must include verification that the payout request forms (original and copy) agree to the jackpot slip. Verify the written procedures are available to all applicable employees.
5. Licensees who have received written approval from the Division for the use of its gaming system may process slot fills without a verifier. Processing the fill without a verifier applies only to fill events recognized by the system that does not require an override or manual intervention. Observe the process or interview slot and cage personnel to determine their understanding of this procedure.
6. Licensees must have written procedures that adequately address overrides to system-generated information on any jackpot payout/fill slips. The written procedures must be available to those individuals who are involved in the override process. A supervisory or management employee (i.e., shift manager or gaming manager) must independently authorize system overrides, with the exception of rounding to the next denomination or dollar. The individual that initiates the transaction cannot be the individual that authorizes the override. A physical verification by the supervisory or management employee must be performed to determine that the override is appropriate. Authorization is provided once verification is completed. Additionally, the Accounting Department must review all overrides for reasonableness and proper authority. This review must be evidenced on the

C	N	2C	2N
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C	N	2C	2N
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C	N	2C	2N
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C	N	2C	2N
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C	N	2C	2N
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C	N	2C	2N
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## ICMP Compliance Checklist: Section 4, SLOT MACHINES

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supporting documentation by the reviewer's initials and date of the review. Observe the process and interview slot and cage personnel to determine their understanding of this procedure.

7. Upon completion of a jackpot payout to the patron, the patron is requested to play off the machine. If the patron declines to play off the machine, the licensee must have adequate procedures in place to prevent a patron from claiming a jackpot already paid (i.e., take a coin from the hopper or obtain the minimal amount of funds from the cashier cage to play off the machine). Observe the process or interview slot and cage personnel to determine their understanding of this procedure.

C	N	2C	2N
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8. Some slot machines allow patrons who have won credits greater than the hopper lockout amount to continue playing these credits once the slot attendant resets the game. If a jackpot of \$1,200 or more occurs on one of these slot machines, a W-2G must still be completed. Note: The licensee must replace the lock shipped with the machine with a licensee specific key before these games can be played. Observe the process or interview slot and cage personnel to determine their understanding of this procedure.

C	N	2C	2N
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9. The original (white) of the payout or fill slip, and the payout request form, if applicable, is deposited in the locked accounting box or hand delivered directly to the Accounting Department upon completion of the transaction. Multiple slips may be routed simultaneously; however, the slips must remain under the control of the slot attendant, in plain sight, until routed to accounting. For multiple processing/routing of slips, the licensee must have written procedures to minimize potential errors by employees and must ensure employees are knowledgeable of the procedures. The procedures must also include the number of slips processed and routed at the same time and must be prominently posted in the Slot Department and cashier cage. The yellow copy of the slip is retained by the cashier, documenting funds leaving the cage. Interview the slot and cage personnel to determine their understanding of this procedure. Verify the written policy is posted and includes all the required information.

C	N	2C	2N
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10. Payouts (computerized or manual process), including jackpots, fills, cancelled credits, progressive payouts, external bonus payouts, and additional payouts, shall be controlled and completed in a manner that precludes any one individual from initiating and producing a fraudulent payout form, obtaining the funds, forging signatures on the payout form, routing all parts of the form, and misappropriating the funds. Observe the process and interview slot and cage personnel to determine compliance with this requirement.

C	N	2C	2N
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11. For payouts of less than the denomination value of tokenized machines, licensees may use a tokenized credit payout slip (or a manual jackpot payout slip) to document the payout. When a tokenized machine requires a payout of less than its denomination value, the slot attendant shall complete the payout slip with the date, time, machine number, and amount. The attendant shall then sign the slip and present it to the patron for redemption at the cage. When the patron redeems the slip at the cage, both the patron and cashier must sign

C	N	2C	2N
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## ICMP Compliance Checklist: Section 4, SLOT MACHINES

### For Use by Division of Gaming and Independent Compliance Officers (ICOs)

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the slip. Interview the slot and cage personnel to determine their understanding of this procedure.

12. The slip must be alphanumerically numbered and reflect the date, time, machine number, amount of payout, and signatures of slot attendant, patron, and cashier. A log must be maintained to record the sequence of slips as they are checked out. Review paperwork to verify the required information is obtained.

C	N	2C	2N
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13. Licensees who utilize an automated gaming system to generate jackpot payout slips may continue to use the system-generated slip and process the payout. Licensees who continue to use the system generated slip for these payouts of less than the denomination value of tokenized machines do not need to have a verifier involved to verify the payout, verify the meters, or sign the slip. Interview the slot and cage personnel to determine their understanding of this procedure.

C	N	2C	2N
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14. For abandoned credits left on tokenized machines in an amount less than the tokenized amount, the slot attendant may key off the credits on the machine. Interview the slot personnel to determine their understanding of this procedure.

C	N	2C	2N
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15. Any money found by employees (i.e., in the coin return, in the tray, or on the floor), and any abandoned credits on a slot machine that do not meet the criteria addressed above, should be receipted into the cage as miscellaneous receipts. Interview the slot personnel to determine their understanding of this procedure.

C	N	2C	2N
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### ICMP – SLOTS – J. POUCH PAYS

Jackpot payouts, as referred to in this subsection, include attendant paid jackpots, attendant paid cancelled credits, attendant paid progressive, and attendant paid external bonuses.

1. Licensees who have received written approval from the Division for the use of its gaming system are allowed to make change for patrons, pay promotional coupons, and pay slot machine jackpot payouts via pouch pay. The following criteria for jackpot payments must be adhered to:

C	N	2C	2N
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- Only system generated jackpots may be paid. Transactions which require override authorization that includes additional payouts may not be paid via a pouch pay.
- Jackpots under \$1,200 may be paid via a pouch pay.
- If communication between the slot machine and the system is down, no jackpot payments may occur via a pouch pay. The jackpot payment must occur through the cage.

## ICMP Compliance Checklist: Section 4, SLOT MACHINES

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Interview the slot and cage personnel to determine their understanding of these requirements. Verify the licensee received approval to rely on its system.

#### POUCH PAY/BANK CHECK OUT PROCEDURES – FROM THE CASHIER CAGE TO THE FLOOR PERSON

1. Pouch pay banks (funds) are a part of the cashier cage accountability and must be documented on the Daily Cash Summary. Pouch pay banks are maintained in the cashier cage or in an alternate locked and secured area (pouch cabinet) under surveillance coverage. Verify the banks are properly recorded and secured. Observe the process to determine compliance with this procedure.

C	N	2C	2N
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2. Imprest banks/pouches may be prepared prior to check out, as long as the imprest amount is reflected on the Daily Cash Summary. The cashier preparing or disbursing the bank to the floor person performs an inventory of the bank and completes an imprest bank inventory form. A miscellaneous disbursement form is completed by the cashier to support that the funds are leaving the cage. The inventory form is attached to the miscellaneous disbursement form. Observe the process to determine compliance with this procedure.

C	N	2C	2N
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3. The cashier gives the floor person an imprest bank/pouch and completes the paid out portion of the miscellaneous disbursement form by documenting the date, shift, dollar amount of the bank, and validation device identifier (if applicable). Observe the process to determine compliance with this procedure.

C	N	2C	2N
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4. The floor person recounts the imprest bank/pouch. If there are no discrepancies, both the cashier and the floor person sign the imprest bank inventory and miscellaneous disbursement forms. The cashier maintains the bank imprest inventory form and the miscellaneous disbursement form. Observe the process to determine compliance with this procedure.

C	N	2C	2N
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5. Pouch pay banks may be disbursed from the cage to an alternate locked and secured area (pouch cabinet) under surveillance coverage. Adequate controls must be in place to ensure the licensee's assets are secured. Licensees must have adequate written controls in place for pouch pay banks maintained in a pouch cabinet to ensure assets are secured. Two licensed individuals must count and complete an inventory sheet at the beginning and end of the shift in which the pouch is utilized. Observe the process to determine compliance with this procedure.

C	N	2C	2N
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#### POUCH PAY FLOOR PERSON PAY PROCEDURES

##### *Jackpot Payouts*

1. The floor person follows the licensee's procedures in order to signal the system to print the jackpot payout slip (i.e., insert slot card into machine's card reader and key the jackpot amount). The floor person proceeds to the cashier cage or a jackpot workstation to retrieve both the white and yellow copies of the jackpot slip. If an override, additional payouts or a jackpot payout of \$1,200 or greater (large jackpot) is required, the payment is processed as

C	N	2C	2N
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## ICMP Compliance Checklist: Section 4, SLOT MACHINES

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described under the ICMP subsection H, Jackpot Payouts. Observe or interview licensee personnel to determine compliance with this procedure.

2. If the jackpot payout is not an override or is less than \$1,200, the floor person indicates pouch pay on the cashier line. The floor person proceeds to the slot machine and compares the information printed on the jackpot slip to the slot machine, pays the patron, and signs the slip. Observe the process to determine compliance with this procedure.

C	N	2C	2N
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3. The original (white) is dropped in the locked accounting box and the yellow copy is maintained with the imprest bank/pouch to reconcile the funds. The licensee may follow its in-house procedures for payment of multiple jackpots or drop the slip immediately. Observe the process to determine compliance with this procedure.

C	N	2C	2N
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#### ***Tickets, Purchase Tickets and Slot Coupons***

1. The floor person reviews the ticket, purchase ticket or slot coupon for distinguishing characteristics (e.g., thermal paper, reflects the licensee's name, has not expired, etc.). The floor person scans the ticket or slot coupon using the validation device, verifies the amount agrees to the amount indicated on the validation unit, and validates the ticket or slot coupon in the system. Observe the process to determine compliance with this procedure.

C	N	2C	2N
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2. If no discrepancies are identified, the floor person pays the patron. The floor person maintains the ticket, purchase tickets or slot coupon with the imprest bank/pouch until the tickets, purchase tickets and or slot coupons are exchanged at the cashier cage. Observe the process to determine compliance with this procedure.

C	N	2C	2N
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3. If any discrepancies are identified, communication has been lost, or any suspicion of a problem with the ticket, purchase tickets or slot coupon is identified, the floor person is not allowed to process or pay the ticket, purchase ticket or slot coupon. The ticket or slot coupon is returned to the patron and the patron is directed to take the ticket, purchase ticket or slot coupon to the cashier cage for redemption. Observe or interview licensee personnel to determine compliance with this procedure.

C	N	2C	2N
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#### ***Even Money Exchanges***

1. An even money exchange form is used to document the reimprest of the imprest bank/pouch. Observe the process to determine compliance with this procedure.

C	N	2C	2N
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2. The floor person prints or requests the cashier or key on duty to print a report that details the tickets, purchase tickets and slot coupons redeemed by that floor person during their shift. The floor person will reconcile their tickets, purchase tickets and slot coupons to this report. Observe the process to determine compliance with this procedure.

C	N	2C	2N
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3. The floor person completes the change bank exchange form totaling the jackpot payout slips, tickets, purchase tickets and slot coupons. The floor person gives the yellow copy of the jackpot payout slips, tickets, purchase tickets, slot coupons and report that details the

C	N	2C	2N
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## ICMP Compliance Checklist: Section 4, SLOT MACHINES

### For Use by Division of Gaming and Independent Compliance Officers (ICOs)

**Legend:****C** = In Compliance**N** = Noncompliance**2C** = In Compliance at Follow-up**2N** = Noncompliance at Follow-up

tickets, purchase tickets and slot coupons redeemed by that floor person during their shift to the cashier, along with the even money exchange form. The cashier verifies the total amount of tickets, purchase tickets and slot coupons to the report and totals the jackpot payout slips. Observe the process to determine compliance with this procedure.

4. The cashier gives the funds to the floor person to reimpress their imprest bank/pouch. The floor person verifies the funds and agrees the amount to the amount requested on the even money exchange form. If no discrepancies are identified, both the cashier and floor person sign the even money exchange form indicating the proper completion of the form and receipt of the funds and documents. The floor person places the money in the imprest bank/pouch. The even money exchange form is maintained by the cashier completing the transaction. Observe the process to determine compliance with this procedure.

C	N	2C	2N
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#### ***Pouch Pay/Bank Check in Procedures – From the Floor Person to the Cashier Cage***

1. The floor person prints or requests the cashier or gaming manager to print a report that details the tickets, purchase tickets and slot coupons redeemed by that floor person during their shift or session. The floor person reconciles their tickets, purchase tickets and slot coupons to this report. If an even money exchange was performed during the shift and tickets, purchase tickets and slot coupons were exchanged with the cashier, this report may list all tickets, purchase tickets and slot coupons that were redeemed by the floor person during their shift. If this is the case, a reconciliation of current tickets, purchase tickets and slot coupons plus the tickets, purchase tickets and slot coupons already exchanged with the cage must be performed to ensure that all tickets, purchase tickets and slot coupons redeemed are accounted for. The report printed at the time of even money exchanges may be used to assist in the reconciliation. Licensee must ensure a procedure is in place in order for the floor person to perform an adequate reconciliation when tickets, purchase tickets and slot coupons have been previously exchanged with the cage during the shift. Observe the process to determine compliance with this procedure.

C	N	2C	2N
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2. The floor person turns in their cash and yellow copy of the jackpot payout slips, tickets, purchase tickets, slot coupons and report to the cashier. The cashier counts the cash, verifies the tickets, purchase tickets and slot coupons to the report, and totals the jackpot payout slips. A new imprest bank inventory form is completed and the dollar amount of the inventory must tie to the original imprest bank/pouch inventory amount. Both the cashier and the floor person sign the inventory form and the cashier retains the form. Observe the process to determine compliance with this procedure.

C	N	2C	2N
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3. The cashier completes the paid in portion of the miscellaneous receipt form documenting the date, shift, amount, and validation device identifier (if applicable) of the bank. The cashier and the floor person sign the miscellaneous receipt form. The imprest bank inventory forms and the miscellaneous receipt form, jackpot payout slips, tickets, purchase tickets, slot coupons and reports are maintained by the cashier, the amounts recorded on the Daily Cash Summary and forwarded to accounting with the cage paperwork for that shift. The imprest bank can be reimpressed prior to checking the bank into the cage.

C	N	2C	2N
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## ICMP Compliance Checklist: Section 4, SLOT MACHINES

### For Use by Division of Gaming and Independent Compliance Officers (ICOs)

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Observe the process to determine compliance with this procedure.

4. If an overage or shortage occurs, the floor person completes an overage or shortage slip and the supervisor shall investigate any overages/shortages. If an overage occurs, the excess amount from the floor person's bank is given to the cage cashier who records the overage as a separate line item on the Daily Cash Summary. If a shortage occurs, a shortage slip is prepared and given to the cage cashier. The cage cashier records the shortage as a separate line item on the Daily Cash Summary. Observe the process or interview cage personnel to determine compliance with this procedure.

C	N	2C	2N
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#### ICMP – SLOTS – K. SHORT PAYS

1. If a short pay occurs due to a machine malfunction, the short pay amount shall be disbursed from the cage as a miscellaneous disbursement and paid to the patron. Once the machine is fixed, the cash paid out of the slot machine shall be receipted back into the cage as a miscellaneous receipt. The machine number and explanation must be included on the miscellaneous disbursement and receipt forms. Interview the cage and slot personnel to determine their understanding of this procedure.

C	N	2C	2N
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#### ICMP – SLOTS – L. DISPUTED JACKPOTS AND PATRON DISPUTES

1. For any disputed jackpot, the floor supervisor or gaming manager must be called. If neither one of these individuals can resolve the dispute or if the dispute involves \$1,250 or more, the Division must be contacted. The slot machine shall *not* be reset or altered (i.e., no further play) until a gaming investigator has arrived. If the machine has been reset to allow the patron to continue playing credits not associated with the payout, the payout request form should be reviewed to assist in resolving the dispute; it may also be necessary to review slot system reports. Interview the slot and management personnel to determine their understanding of this requirement.

C	N	2C	2N
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2. Coins needed to resolve minor customer disputes may be obtained from the hopper by authorized personnel, if the dispute involves ten coins or less. If the resolution involves more than ten coins, the coins must be disbursed from the cage as a miscellaneous disbursement – short pay. Interview the cage and slot personnel to determine their understanding of this procedure.

C	N	2C	2N
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#### ICMP – SLOTS – M. UNCLAIMED JACKPOTS

1. An unclaimed jackpot receipt is completed when a patron is unable to provide proper identification for jackpot payouts greater than, or equal to, \$1,200. Observe the process or interview cage personnel to determine compliance with this procedure.
2. The cashier completes the unclaimed jackpot receipt, a pre-numbered, three-part form. The cashier, patron and slot supervisor/key employee sign all three parts of the receipt. The

C	N	2C	2N
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C	N	2C	2N
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## ICMP Compliance Checklist: Section 4, SLOT MACHINES

### For Use by Division of Gaming and Independent Compliance Officers (ICOs)

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cashier maintains the original (white) of the unclaimed jackpot receipt with the original (white) of the jackpot payout/fill slip. A photograph of the patron, at the time of winning, must also be attached to the cashier's receipt. The photograph is used to verify the correct patron claims the jackpot. The patron retains the yellow copy of the unclaimed jackpot receipt. The pink copy of the unclaimed jackpot receipt is attached to the yellow copy of the jackpot/fill slip and is forwarded to accounting by the cashier with their cage paperwork. Observe the process or interview cage personnel to determine compliance with this procedure.

3. The licensee must have procedures in place to verify the legitimacy of the patron claiming payment of the unclaimed jackpot. Upon receipt of the patron's copy, the rest of the receipt is completed with the cashier, patron, and slot supervisor/key employee signing the slip indicating payment. Licensees must verify whether the taxable jackpot winner is listed in the GPI registry when the patron claims the jackpot. The receipt is attached to the original (white) and photograph, and all paperwork is forwarded to accounting along with the cage paperwork. Observe the process or interview cage and floor personnel to determine compliance with this procedure.

C	N	2C	2N
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4. The licensee must have procedures in place to:

- Track unclaimed jackpot receipts and related jackpot slips upon issuance,
- Track which slips are still outstanding,
- Track which slips are paid, and
- Pay patrons if the paperwork has been dropped to accounting.

Review the licensee's procedures to determine if it addresses these areas.

C	N	2C	2N
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#### **ICMP – SLOTS – N. ADDITIONAL PAYOUTS**

1. Prior to offering additional payouts to patrons, the licensee must notify the Division, in writing, at least seven days in advance, of the information outlined in the ICMP. Verify additional payout programs were approved by the Division and the required information was submitted.

C	N	2C	2N
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2. Each slot machine offering additional payouts must be clearly marked in such a manner as to inform all patrons of the information outlined in the ICMP. If the licensee is offering an item other than cash (e.g., car or motorcycle), the licensee may state the item(s) only and not the dollar amount, if the item is the only payout. If the patron has an option of the item or a dollar amount, then both awards must be posted. Verify the additional payout program is clearly identified or interview personnel involved with additional payouts to determine their understanding of this procedure.

C	N	2C	2N
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3. Additional payouts must be associated with attendant paid events and cannot be processed via a pouch pay or the use of a payout request form. Additional payouts may not be awarded with machine paid events. Observe or interview personnel involved with

C	N	2C	2N
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## ICMP Compliance Checklist: Section 4, SLOT MACHINES

### For Use by Division of Gaming and Independent Compliance Officers (ICOs)

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additional payouts to determine their understanding of this requirement.

4. For all additional payouts awarded, follow the procedures outlined for jackpots of \$1,200 or more. A W-2G must be completed when the total amount awarded is \$1,200 or more. When an additional payout is awarded, licensees must account for the payouts. Jackpot payout slips must be completed for these payouts as discussed in the preceding section. Regardless of the amount disbursed to the patron, the patron must sign the jackpot payout slip indicating receipt of the funds, after receipt of funds, for all additional payouts. If the patron's signature is not obtained, the additional payout is subject to denial for gaming tax purposes. Observe or interview personnel involved with additional payouts to determine their understanding of this requirement.

C	N	2C	2N
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5. If a licensee changes the top award and it exceeds the top award indicated on the par sheet, the excess must be submitted as an additional payout. Under no circumstances is the top award allowed to be lower than that indicated amount on the par sheet. Interview slot personnel involved with additional payouts to determine their understanding of this requirement.

C	N	2C	2N
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6. During the six-month period the licensee offers the additional payout, the licensee must ensure any changes to the additional payout program are communicated immediately to the Division, in writing. Updates to the additional payout program include changes to any of the information on the additional payout request form such as the deletion of slot machines, adding new machines, changing machine numbers, canceling the additional payout program, changing the award amount, changing the times and conditions of the additional payout program, etc. Interview personnel involved with additional payouts to determine their understanding of this procedure.

C	N	2C	2N
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7. The list of machines submitted to the Division should agree to the machines offering additional payouts on the gaming floor. Compare the list of approved machines offering additional payouts to the machines on the gaming floor. Note any differences and notify the Division.

C	N	2C	2N
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### ICMP – SLOTS – O. PROGRESSIVE SLOT MACHINES

#### GENERAL

1. Each progressive slot machine game must be linked to a display showing the payoff. The payoff, referred to as the advertised amount, must be visible to all patrons playing a game that has the potential to win the progressive jackpot. Verify the progressives meet this requirement.

C	N	2C	2N
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#### TRANSFER OF PROGRESSIVE LIABILITY

1. Pursuant to CLGR 30-1244(12), no licensee may discontinue a progressive slot machine game until all of the advertised progressive amounts have been awarded, or the advertised progressive amount, minus the normal non-progressive award for the combination that

C	N	2C	2N
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Revised December 2020

Effective November 2022

## ICMP Compliance Checklist: Section 4, SLOT MACHINES

### For Use by Division of Gaming and Independent Compliance Officers (ICOs)

**Legend:****C** = In Compliance**N** = Noncompliance**2C** = In Compliance at Follow-up**2N** = Noncompliance at Follow-up

would have awarded the progressive amount, is transferred to another progressive link within the licensed establishment. Interview slot personnel and determine his/her understanding of this requirement.

2. Denomination changes are considered transfers. The licensee may change the denomination of a progressive slot machine game, or a progressive slot machine game bank, prior to a patron winning the progressive jackpot, provided that a documented progressive transfer has been completed. Licensees must maintain proper documentation of all progressive liability transfers. This documentation must be made available to Division personnel upon request. All progressive liability transfers must be documented at the time of the progressive discontinuance. Interview the slot personnel to determine their understanding of this requirement.

C	N	2C	2N
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**RESET AMOUNT**

1. The reset amount for a progressive jackpot must be equal to, or greater than, the top award (base amount) shown on the par sheet of any machine on the link. If more than one progressive jackpot will be awarded (stand alone or linked), such as a progressive jackpot for both the top and second awards on the slot machine, the reset amount for each must be equal to, or greater than, the highest corresponding awards. Interview the slot personnel to determine their understanding of this requirement.
2. After a progressive jackpot has been put into play, the advertised amount may not be lowered until won by a patron, unless the progressive is transferred or discontinued in a manner approved by the Division. Interview the slot personnel to determine their understanding of this requirement.

C	N	2C	2N
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C	N	2C	2N
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**PROGRESSIVE CONTROLLER**

1. Pursuant to CLGR 30-1244(6), the Licensee must establish key control procedures to prevent unauthorized access to the progressive controller.

C	N	2C	2N
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**ICMP – SLOTS – P. SLOT TOURNAMENT PROCEDURES**

1. An informational copy of the slot tournament rules, list of machines used in the tournament and machine set up must be provided to the Division at least five days prior to the scheduled start of the tournament. When the licensee is using a Colorado approved game program for tournaments, no description of how the machine will be disabled need be submitted to the Division. All required forms must be completed for all tournaments held. Interview personnel involved with slot tournaments to determine their understanding of this procedure.
2. Immediately prior, and subsequent to, the slot tournament, soft or system meters must be read for all machines used in the slot tournament. No meters may increment during tournament play. Interview personnel involved with slot tournaments to determine their

C	N	2C	2N
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C	N	2C	2N
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## ICMP Compliance Checklist: Section 4, SLOT MACHINES

### For Use by Division of Gaming and Independent Compliance Officers (ICOs)

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understanding of this procedure.

3. Slot tournament entry fees are documented on a slot tournament entry fee log. The slot supervisor or their designee shall complete the information at the time the entry fee is collected with the name of patron and amount of the entry fee and/or the complimentary amount. Observe or interview personnel involved with slot tournaments to determine their understanding of this procedure.

C	N	2C	2N
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4. 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 and the total is reflected in the total non-cash column. A notation is made on the log stating the non-cash items received (e.g., toy, food, etc.). Observe or interview personnel involved with slot tournaments to determine their understanding of this procedure.

C	N	2C	2N
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5. At the end of the buy-in/sign-in period, the slot supervisor, or their designee, and another licensed individual shall independently recalculate the total entry fees collected, as shown on the log, count and verify the fees, and sign the log indicating proper completion and accuracy of the log. Any variances shall be noted. The count of the monies must be conducted in a secure area under surveillance. Observe or interview personnel involved with slot tournaments to determine their understanding of this procedure.

C	N	2C	2N
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6. The monies and entry fee log is then delivered to the cashier cage. The cashier shall count the funds to verify accuracy of the entry fee log. If the amounts do not agree, the cashier and slot supervisor, or their designee, shall investigate and resolve all differences. When the amounts agree, the cashier signs the log indicating receipt of the funds into the cage as slot tournament entry fees. The slot supervisor, or their designee, immediately deposits the slot tournament entry fee log in the locked accounting box. Observe or interview personnel involved with slot tournaments to determine their understanding of this procedure.

C	N	2C	2N
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7. The cost of all prizes and monies paid to the winner(s) must be recorded on a two-part form titled slot tournament prize form. This form shall be alphanumerically and sequentially numbered, and contain the information as outlined in the ICMP. The slot supervisor, or their designee, must sign both copies of the form, indicating accuracy of the form and disbursement of the prize. The patron must sign both copies upon receipt of the prize. The verifier (preferably from security) shall verify the amount paid to the patron agrees to the form and signs both copies of the form, indicating the amount stated on the form agrees to the amount given to the patron. Observe or interview personnel involved with slot tournaments to determine their understanding of this procedure.

C	N	2C	2N
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8. The verifier must immediately deposit the original (white) of the prize form in the locked accounting box. The yellow copy of the form shall be retained with the bank from which the prizes were disbursed. After all prizes are awarded, the yellow copy is placed in the locked accounting box by the individual disbursing the prizes. Observe or interview personnel involved with slot tournaments to determine their understanding of this procedure.

C	N	2C	2N
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**ICMP Compliance Checklist: Section 4, SLOT MACHINES**  
**For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

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**ICMP – ACCOUNTING – A. GENERAL**

1. Inquire about slot's procedures for investigating variances on the statistical reports forwarded from the Accounting Department to the Slot Department. The licensee should have a process for investigating and documenting the variances. Inquire about the time it takes to receive the variances from accounting, getting the variances investigated, documented, and returned back to accounting.
2. Request the slot personnel demonstrate their methods for investigating coin, bill validator, ticket and jackpot variances. Document any areas of concern or deficiencies in the procedures used by the slot personnel.
3. Determine if the Slot Department is current in processing variance investigations. Request the slot personnel show the oldest variances they are investigating. Document the date of the oldest investigations the slot personnel assigned the investigation.

C	N	2C	2N
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C	N	2C	2N
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C	N	2C	2N
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**COLORADO LIMITED GAMING REGULATIONS (CLGR)**  
**RULE 12 – GAMING DEVICES AND EQUIPMENT**

1. **CLGR 30-1218 Ownership identification on gaming devices**

If the retail licensee is not responsible for the repairs, malfunctions, payment of winnings, or disputes regarding payments for a slot machine, the retailer must affix in a prominent place to each slot machine exposed for play, pursuant to the operator's license or an agreement, a sign or label that identifies the person or persons responsible for repairs or malfunctions of the machine, payments of winnings, and disputes regarding payments. Select a sample of machines to determine compliance with this requirement.

C	N	2C	2N
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2. **CLGR 30-1230 Automatic light**

A light must be installed on the top of the slot machine that automatically illuminates whenever the interior of the slot machine is accessed. Video bar top slot machines do not need a light, but must display a message on the screen indicating that a door is open. Select a sample of machines to determine compliance with this requirement.

C	N	2C	2N
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3. **CLGR 30-1233 Rules of play**

The rules of play for a slot machine game must be displayable on the slot machine face, glass or video screen. Rules of play must have approval of the Division. The Division may immediately disable a slot machine game from patron play if the rules of play are unavailable, incomplete, confusing, or misleading. Select a sample of machines to determine compliance with this requirement.

C	N	2C	2N
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4. **CLGR 30-1244 (11) Progressive slot machines defined**

A licensee may impose a limit on the jackpot of a progressive slot machine game if the limit imposed is greater than the current progressive jackpot displayed on the slot machine game at

C	N	2C	2N
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## ICMP Compliance Checklist: Section 4, SLOT MACHINES

### For Use by Division of Gaming and Independent Compliance Officers (ICOs)

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the time the limit is imposed. The licensee must inform the public with a prominently posted notice of progressive slot machine games with the limits. Select a sample of machines or interview slot personnel to determine compliance with this requirement.

5. **CLGR 30-1248 Entry fee**

The tournament entry fee for each player may not exceed \$500 for the entire tournament, regardless of the number of qualifications or play-off rounds played. The tournament must be structured so that the minimum number of machine plays available to each player, without the accumulation of any winning credits, is equal to not less than the entry fee divided by five. Select a sample of machines or interview slot personnel to determine compliance with this requirement.

C	N	2C	2N
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6. **CLGR 30-1259 Incidental repairs**

A licensed manufacturer or distributor, operator, retailer, or associated equipment supplier may perform incidental repair on its gaming devices and associated equipment. All persons actually performing internal service or repairs must display a current Colorado gaming license. The licensee is responsible for ensuring that all service work, including the installation or repairs of component parts and associated equipment such as bill validators, ticket printers, gaming systems, kiosks or other parts which would significantly alter the current or subsequent operation of the gaming devices or associated equipment, are done correctly and are in compliance with Division requirements. Interview the slot personnel to determine their understanding of this requirement.

C	N	2C	2N
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**Additional Comments:**

**Review Recap**

*Initial Review      Follow-up*

(1) Total items tested      \_\_\_\_\_      \_\_\_\_\_

(2) Total noncompliance items      \_\_\_\_\_      \_\_\_\_\_

**ICMP Compliance Checklist: Section 5, TABLE GAMES, SLOT AND KIOSK DROP & COUNT PROCEDURES**  
**For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

**Legend:**

**C** = In Compliance

**N** = Noncompliance

**2C** = In Compliance at Follow-up

**2N** = Noncompliance at Follow-up

Licensee Name	<b>Review Recap</b>		
Prepared By			
Period Reviewed (ICO Use Only)		Initial Review	Follow-up
Date & Time Completed	(1) Total items tested		
Date Follow-up Performed	(2) Total noncompliance items		

**DIVISION OF GAMING USE ONLY**

Employee Signature & License #

Casino Manager Signature & License #

**ICMP – TABLE GAMES, SLOT AND KIOSK DROP AND COUNT PROCEDURES - A. GENERAL**

**DROP AND COUNT TEAM MEMBERS**

1. The drop and count teams may not be under the direct control of the accounting personnel performing the audit of gaming revenue. This requirement is to ensure the proper segregation of duties. The drop and count functions must be separate and distinct from the cage since the cage personnel count, verify and accept the count funds. The actions of the drop and count team and the cage are reviewed by the accounting department. It is acceptable that the three departments answer to one entity, but not to each other. Ensure this requirement is being met.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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2. Accounting personnel are prohibited from participating in any drop and/or count. The gaming manager is not allowed to participate on the soft (table games) count team, or allowed in the count room during the soft (table games) count. No more than one member of the drop and/or count team can be an owner, partner, person with 5% or more equity in the licensee, or an immediate family member (as defined in section 30-103, C.R.S.) of the owner(s), partners, or persons with 5% or more equity. Interview drop and count team members and determine their understanding of this requirement.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**KEY CONTROL**

1. Licensees must have processes in place for appropriate key control. Ensure adequate key control is in place.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**BREAKS**

1. For any break taken either prior to or during a drop and/or count, the following procedures apply. All keys are checked back into the two keyed locked boxes and at the conclusion of the break all keys are checked out again. Alternatively, the keys may be maintained by at least three drop/count team members who are required to stay together and are under surveillance at all times. Through observation of the

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**ICMP Compliance Checklist: Section 5, TABLE GAMES, SLOT AND KIOSK DROP & COUNT PROCEDURES**  
**For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

**Legend:**

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**N** = Noncompliance

**2C** = In Compliance at Follow-up

**2N** = Noncompliance at Follow-up

drop/count process, confirm the drop/count team complies with this requirement.

2. If the count team consists of more than three team members, a team member may leave the count room as long as three team members remain in the count room. Before a team member leaves the room, the other team members must stop what they are doing and observe the other team member leave. Upon returning to the count room, the remaining team members in the count room must stop what they are doing, allow the team member into the count room, and observe the team member enter. The count keys are retained in the count room with the remaining count team members at all times. Through observation of the count process, confirm the count team complies with this requirement.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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3. If all members of the table games, kiosk, or slot count team leave the count room during the count for a break, funds and paperwork must be secured to prevent unauthorized access. Only the count team may have access to the funds and paperwork and all team members must be present to access the count room, funds, and paperwork at all times during the count and through completion of the count. Through observation of the count process, confirm the count team complies with this requirement.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**EXTRANEIOUS ITEMS IN COUNT ROOMS**

1. During the drop and/or count, no extraneous items are allowed in the count room. Count team members may not have any personal currency/coins on their person. Licensees may allow a boom box, tapes and CDs in the count room for use by the count team. Count team members and the cashier accepting the count proceeds are allowed to have extra garments in the count room (e.g., long sleeve shirts, sweaters, sweatshirts, etc.). Security must check these items as they are brought into the count room or removed from the count room to reduce the risk of theft utilizing any such items. Interview drop and count team members and determine their understanding of this procedure. Ensure this requirement is being met.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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2. If count team members have beverage containers and/or trash cans in the count room, management must ensure that appropriate written policies and controls are in place to prevent any theft of monies utilizing any such containers. Interview drop and count team members and determine their understanding of this requirement. Verify there is a written policy.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**COUNT AREA**

1. The count room must remain locked at all times. Access to the count room while the count is being performed is restricted to the count team members, a supervisor to resolve discrepancies that have to be resolved immediately in order to satisfactorily complete the count, other authorized personnel as approved by the Division (e.g., independent auditors, etc.) and authorized maintenance people needed to repair equipment so the count may continue. At no time will preventative or scheduled maintenance on equipment be performed during a count. Access to the count room

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**ICMP Compliance Checklist: Section 5, TABLE GAMES, SLOT AND KIOSK DROP & COUNT PROCEDURES  
For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

**Legend:**

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during a count to repair equipment necessary to complete the count does not require the count monies to be secured. The count team must stop all count activity and observe the repair person upon entering the count room. The repair person may remain in the room after the repair is completed, for a reasonable amount of time, to verify the machine is operating correctly during the count. At least three members of the count team must be present in the count room at all times until the entire drop is counted. Ensure this requirement is being met.

**COUNT ORDER**

- Drop and count consists of several different processes (e.g., table games drop and count, EBT drop and count, kiosk drop and count, slot machine drop and count). The times of the drops and counts are submitted to the Division on the drop and count schedule. The intent is to segregate and not commingle the funds from the different types of counts. Slot funds must be attributed to the slot machine from which the funds were derived, kiosk funds must be attributed to the kiosk device from which the funds were derived, and table games, including EBT funds, must be attributed to the table game from which the funds were derived. Through observation of the count process, confirm the count team complies with this requirement.

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**TEST MONEY**

- It is an acceptable procedure to allow test money to be maintained in the count room. A set amount of bills and/or tickets may be used by the count team to facilitate the testing of the currency counter. The test money is a predetermined constant dollar amount and is located in a secure area within the count room or checked out of and back into the cashier cage for this purpose. The key(s) to the secure location of the test money is checked out with the rest of the count keys. The key(s) to the test money can be maintained in the Drop Key Box with the rest of the count team keys. If the Drop Key Box is not used, the key(s) to the test money is maintained in a secure location other than box 1 or 2. Through observation of the count process, confirm the count team complies with this requirement.

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**TESTING OF COUNTING DEVICES**

- For multiple types of counts (table games (drop boxes and EBT), kiosk, slot, and hopper) one test of the count equipment is sufficient so long as the counts are from the same counter, successive, contiguous, and conducted by the same team. If a count immediately follows another count process in which the currency counter was tested and the count was performed by the same team members, the count team indicates such on the count paperwork and is not required to retest the currency counter. Through observation of the count process, confirm the count team complies with this requirement.
- Counting devices used to count or weigh coin and/or tokens must be tested prior to utilization. All testing must be documented. Each count machine must be individually tested and the test documented. Prior to running any specific denomination of bills or tickets through a counting machine, the machine must be tested by one count team

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**ICMP Compliance Checklist: Section 5, TABLE GAMES, SLOT AND KIOSK DROP & COUNT PROCEDURES**  
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member with a predetermined number of bills or amount to ensure accuracy of the machine and proper sorting by denomination. Another team member records the number of bills or amount used to test the machine, the number of bills or amount counted by the machine, and any discrepancies. Both members sign the appropriate paperwork (e.g., Master Games Sheet and/or Bill Validator (BV) Summary) to document the testing process. If a currency counter is not used, mark this section N/A. In the event the currency counting machine is not functioning properly, the licensee must document the event. If the currency counting machine is not functioning and the licensee chooses to continue with the count, procedures must be in place to ensure an accurate count is performed. If at any time the accuracy of the count equipment is in question it must be retested, (e.g., excessive misreads, after cleaning or repair, etc.). Through observation of the count process, confirm the count team complies with this requirement.

**CASHIER ACCEPTANCE OF COUNT FUNDS**

1. The cashier accepting the funds from any drop/count process must be independent of that drop/count process. Through observation of the count process, confirm the count team complies with this requirement.

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2. If the table games count (drop boxes and EBT) is performed and completed at a time when the cashier is not available to accept the funds, the table games count team secures the table and EBT count funds and paperwork in the drop box rack or another secure area under lock and key in the count room, until the cashier is available to accept the funds. When the funds and paperwork are secured, the table games count keys are immediately checked back into the locked key box(s). The keys necessary for the acceptance of the table and EBT count funds are checked out from the locked key box(s) just prior to the cashier acceptance of the funds. Upon completion of the cashier acceptance, the keys are immediately checked back into the locked key box(s). Through observation of the count process, confirm the count team complies with this requirement.

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3. This same process applies if the slot or kiosk counts are completed at a time when the cashier is not available to accept the funds. The funds and paperwork for the slot count are locked in a secure area, separate from other count funds, in the count room. The funds and paperwork for the kiosk count are locked in a secure area, separate from other count funds, in the count room. The slot and kiosk count funds and paperwork must not be commingled. If alternative secure areas are used, each area must be keyed differently. The cashier's acceptance of the count funds must be at the end of all counts or after the completion of a count. The cashier's acceptance of funds must not interrupt any other count. Through observation of the count process, confirm the count team complies with this requirement.

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4. If multiple counts (table games, kiosk, slot) occur on the same day, the cashier may accept the funds from each count at the conclusion of all the counts; however, the unverified funds must be individually locked and not commingled in any manner. At

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the completion of each team count and prior to cashier verification and acceptance, the funds and paperwork are locked in separate locations within the count room. Only the funds, paperwork, and keys associated with the count funds being accepted by the cashier are available to the count team members and the cashier accepting the funds. Through observation of the count process, confirm the count team complies with this requirement.

5. In the event that the paperwork has been forwarded to accounting but the funds are not transferred to the cage after each verification and acceptance of funds, the verified and accepted funds for table games, kiosks, and slots must be physically segregated in the count room. If funds are not transferred after each verification and acceptance, verify that the accepted funds are physically segregated in the count room.

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**CASHIER VERIFICATION PROCESS**

1. At the completion of the count team's count, the count team leader and another team member transfer accountability of the count funds to the cashier. This accountability transfer and cashier verification process must take place in the count room. Each type of unverified count funds (table games, kiosk and slot) are segregated, secured, counted and accepted individually. The cashier verifies the total by independently piece counting the funds. Under no circumstance will funds be commingled and funds must be maintained in separate locked cabinets/racks prior to verification and acceptance by the cashier, if the cashier does not immediately accept the funds. Through observation of the count process, confirm the count team complies with this requirement.

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2. The cashier's count of the table games, kiosk, and slot proceeds consists of the following for each type:
  - The cashier will piece count all \$100's, \$50's and partial straps.
  - At a minimum, the cashier will piece count one of every five straps of \$20's, \$10's, \$5's and \$1's.
  - The cashier will count the remaining funds by strap to arrive at the total being accepted.
  - If there are any differences between the cashier's count and the count team's count by strap or in total, the cashier will recount, by piece, all funds until all discrepancies are resolved.

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Until the cashier accepts the funds, which is indicated by the completion and signing of all paperwork, at least two count team members must remain with the funds. Through observation of the count process, confirm the count team complies with this requirement.

3. To indicate the acceptance of the funds from the count team, the cashier signs the corresponding paperwork. The paperwork for table games funds includes the master

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games sheet. The paperwork for kiosk funds includes the Kiosk Count Form. The paperwork for slot funds includes the Slot Summary Report, the Count (Weigh)/Wrap Variance Report, and/or the BV Summary. The count funds are recorded on the Daily Cash Summary as applicable. Each count process is complete when the cashier verifies and accepts accountability of the funds. As each count process is completed, all documentation from the count, including all tickets, purchase tickets, table game coupons, slot coupons and mobile ATM receipts, must be **immediately** delivered directly to accounting personnel, or deposited in a locked accounting box by a count team member. Through observation of the count process, confirm the count team complies with this requirement.

**COUNT ROOM (MONIES NOT SECURED)**

1. If the count room serves as a coin room and the coin room inventory is not secured to preclude access by the drop/count team, an inventory of the monies must be performed prior to the start of drop procedures including preparation time before the official start of the drop and count. The coin room inventory must be counted by at least two persons, one of whom is a member of the drop and/or count team and the other who is independent of the drop and/or count process (typically a cashier). The count is recorded on an appropriate form. Both individuals performing the count must sign the inventory form attesting to the amount counted. Upon completion of the count, the ending coin room inventory must be counted by at least two persons, one of whom is a member of the drop and/or count team and the other who is independent of the drop and count process. This inventory must be compared to the beginning inventory and any discrepancies resolved. The individuals performing the ending inventory of unsecured monies must also sign the inventory form attesting to the amount counted. The inventory form must be included with the count paperwork. Interview the count team members to determine their understanding of this procedure. Ensure this requirement is being met.

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**ICMP – TABLE GAMES, SLOT AND KIOSK DROP AND COUNT PROCEDURES - B. TABLE GAMES DROP AND COUNT**

**TABLE GAMES DROP TEAM REQUIREMENTS**

1. The drop team consists of a drop team leader and two team members, one of which must be from security. The table drop team cannot consist of any members from the table count team. At least one drop team member must be independent of table game transactions being dropped. Interview drop team members to determine their understanding of this requirement and determine compliance with this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**TABLE GAMES DROP PROCEDURES**

1. Drop procedures (table drop and EBT BV boxes) are performed at the end of each shift and at times which have previously been submitted to the Division on a Drop and Count Schedule. Licensees must have a minimum of one table game shift when the pit is open for any part of the 24 hours gaming day. The term “shift” for table games drop and count refers to the licensee’s established shifts, which would be the entire gaming day if only one shift is conducted. Table drops must commence no more than

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one hour after the scheduled times submitted to the Division. Verify the start of the drop time with the time reported to the Division on the Drop and Count Schedule.

2. All table drop and EBT BV boxes are located in the drop box rack, in the count room. Access to stored drop and EBT BV boxes is restricted to authorized member of the drop and count teams through appropriate key controls. The drop team members obtain the table drop box(es), EBT and poker jackpot award drop box release keys, the count room key, and the table drop box rack key(s).

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3. 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 or EBTs. All team members must remain within full view of each other throughout the EBT drop process including transporting the BV boxes from the floor to the count room. Through observation of the drop, determine compliance with this procedure.

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4. When the exchange of boxes is complete, the entire drop team transports the table and jackpot drop boxes directly to the drop box rack. One team member locks the full drop boxes in the rack. Another team member physically verifies the rack is securely locked. Boxes remain in the locked rack until the count takes place. Through observation of the drop, determine compliance with this procedure.

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5. At the conclusion of the drop, the drop team members, along with a member from security, immediately return the drop keys to the corresponding locked key box(s). Through observation of the drop, determine compliance with this procedure.

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6. Persons authorized to remove the drop boxes from each table or EBT must not have access to table drop box content keys during the transfer of the boxes. The gaming manager must not have access to the table and jackpot award drop box contents key during the drop. Interview drop team members to determine their understanding of this procedure. Through observation of the drop, determine compliance with this procedure.

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7. If a drop box cannot be removed from the table or EBT during the drop due a malfunction, all play must stop until the incident is rectified, the box is removed and the drop box for the next shift is put into place. All incidents are noted on the Table Games Activity Log. If the table or poker jackpot award drop box cannot be removed from the table and the situation cannot be rectified, the licensee must notify the Division for disposition. Interview drop team members to determine their understanding of this procedure.

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8. If the drop team accidentally attaches the wrong box to a table or EBT, the gaming manager must authorize access to the drop and EBT BV boxes for the performance of maintenance. An identification tag showing the correct table number, game type, and

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shift must be securely attached to the box. This identification must be left on the box until the count of that shift is finished. The incident is noted on the Table Games Activity Log.

**TABLE GAMES DROP - MULTI-SHIFT DROP BOXES**

1. A multiple compartment table game drop box may be used when more than one shift is used in a day, which will result in multiple shifts with only one table games drop box removal when the pit is open for any part of the 24 hour gaming day. After table inventory procedures are completed, multi-shift drop boxes are not removed from the table and replaced with a new drop box during shift change (unless it is the last shift of the gaming day). For shift change, the drop team consists of one licensed individual who obtains the table multi-shift drop box shift change key and proceeds to the pit. The drop person cannot participate on the soft count team. The table multi-shift drop box shift change key may not be keyed the same as the table drop box release key or the table drop box content key. Through observation of the drop, determine compliance with this procedure.

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2. Upon completion of the table games inventory and dropping the closer inventory slip in the appropriate shift compartment, the drop person switches the box to the next shift position using the table multi-shift drop box shift change key. The pit supervisor verifies the correct shift compartment is open by inserting the drop paddle into the slot of the drop box and verifying all remaining slots are closed. The opening inventory slip is dropped into the next shift compartment of the box. The table multi-shift drop box shift change key is immediately returned to the locked key box upon completion of the boxes being switched. Normal drop procedures apply for the end of the gaming day drop. Through observation of the drop, determine compliance with this procedure.

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**EMERGENCY DROP AND COUNT PROCEDURES**

1. The drop team requirements for emergency drops are the same as for a regularly scheduled drop. The drop box is tagged with the table or EBT number, drop team signatures, the date, shift, and indicating "emergency drop funds". The funds are immediately taken to the count room, secured in the drop box rack and counted with the next scheduled count. The funds must be secured at all times until counted in accordance with ICMP count procedures. Through observation of the emergency drop, determine compliance with this procedure.

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**EARLY TABLE GAMES DROP PROCEDURES**

1. If a licensee is closing the pit early **and** performs the soft drop at a time other than the regularly scheduled time, the Early Table Drop Log must be completed with the date, day, time of the table drop, time pit closed, names of team members participating in the drop and the reason for the early closing. Interview pit supervisor to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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- The Early Table Drop Log is forwarded to accounting upon completion and at least at the end of the month, whichever occurs first. Interview pit supervisor to determine their understanding of this procedure.

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**TABLE GAMES COUNT TEAM REQUIREMENTS**

- The table games count team consists of a count team leader and two or more count team members. The count team members are rotated on a routine basis. Rotation of count team members must be such that the count team does not consist of the same three individuals for more than five consecutive counts. The count team must be independent of the transactions being reviewed, dropped, counted, and the subsequent accountability of the drop proceeds. The table count team cannot consist of the same members as the table drop team. Verify the count team members meet this requirement.

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**TABLE GAMES COUNT PROCEDURES**

- Count procedures are performed only at times previously submitted to the Division on a drop and count schedule. Count should commence at the previously designated time; however, count may commence at any time up to one hour after the previously designated time. No such window will be allowed prior to the scheduled count time. Verify the count starts at the time, or within one hour of the time, submitted to the Division.
- Permanent changes to the drop and count times must be submitted prior to the requested change date. Such designation must be made to the Division prior to the gaming day in which changes to drop and count times are to take place. All unscheduled counts (i.e., temporary changes) must be tracked and documented, in writing, throughout the month. Count team requirements for unscheduled counts are the same as for any regularly scheduled count. Verify temporary changes are tracked and submitted monthly to the appropriate Division email account and ensure compliance with the count team requirements.
- The count team leader, escorted by the gaming manager and security, obtains the count keys. The count keys include table and EBT drop box content key(s), count room key, the table drop box rack key, and if applicable, the table drop box release key and table multi-shift drop box shift change key. All keys must remain on the count table in full view when not in use. Through observation of the count, determine compliance with this procedure.
- Each box is individually counted and the funds attributed to the proper table or EBT. Under no circumstances shall more than one box be opened or counted at any one time. For multi-shift drop boxes (if applicable), the count team must count the contents of each box (graveyard, day and swing) prior to proceeding to the next drop box. The count team must ensure the monies for each shift are segregated throughout the count process. The count team must ensure the monies counted are documented and attributed to the correct table and shift. Through observation of the

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count, determine compliance with this procedure.

5. The opener unlocks the drop or EBT box, empties the funds from the box, and shows the verifier and the camera that the box is empty. The verifier acknowledges that the box is empty. The acknowledgment must be obvious when reviewing surveillance, such as looking into the box and nodding the head. The recorder must be independent of the first count processes. The opener ensures the proper drop slot on the drop box is open and relocks the box. Through observation of the count, determine compliance with this procedure.

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6. Two count team members (other than the recorder) sort the slips, tickets, chips/tokens and monies from the drop box and the contents from the EBT box. The recorder may participate in the sorting of slips; however, the recorder cannot participate in the sorting or counting of any currency, tickets and/or chips/tokens. All slips and other forms, other than cash, tickets and chips/tokens, are given to the recorder to be examined for correctness and recorded on the master games sheet. Cash, tickets and chips/tokens are placed in the center of the count table, prior to sorting. No sorting may take place until all cash, tickets and chips/tokens are placed in the center of the table.

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Tickets redeemed at the table game and EBT are dropped and counted as part of the regular table games drop and count procedures. Prior to running tickets through the count machine, the machine must be tested by two count team members with a predetermined number of and/or dollar value of tickets to ensure accuracy of the machine. Each function of the count machine must be tested. If the count machine counts the number of tickets, then the number of tickets is tested. If the count machine counts the dollar value of the tickets, then the dollar value of the tickets is tested. The team members record the number and/or dollar value of tickets used to test the count machine, the number of and/or dollar value of tickets counted by the count machine and any discrepancies. This test is documented on the Master Games Sheet. Both team members sign the Master Games Sheet to certify the testing process. In the event the count machine is not functioning properly, the licensee must document this event and attempt to resolve the malfunction.

Each drop box and EBT must be individually counted and the tickets attributed to the table game and EBT that redeemed the tickets. The tickets and bills from the BV must be separated. This can be done by manually sorting the tickets and bills, or by running the bills and tickets through a count machine that distinguishes between the two. If the count machine can only provide the number of tickets in addition to the bill count for each table game and EBT, the tickets for each table game and EBT must be kept separate until counted. This can be accomplished by writing the table game and EBT number on the last or first ticket for that table game and EBT stack of tickets, placing a divider (with the table game and EBT number) between each batch of tickets, or in a similar fashion which ensures the tickets are not commingled prior to the count of the tickets.

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If the count machine is not functioning correctly, the count team must perform a manual count of the tickets. When the tickets are counted manually, two independent counts of the tickets are required, one by the opener and one by the verifier.

The dollar amount of the tickets counted for each table game and EBT is recorded separately as a drop amount for that particular table and EBT on the Soft Count Card and included in the drop portion of the Master Games Sheet.

The total face value of coupons, and mobile ATM receipts used must be recorded on the Soft Count Card and included in the drop portion of the Master Games Sheet. Coupons and ATM receipts must be listed separately under the denomination column on the Soft Count Card. Through observation of the count, determine compliance with this procedure.

7. The total value of non-cashable chips must be recorded on the Soft Count Card and included in the drop portion of the Master Games Sheet.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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8. All currency, chips and tokens are then sorted and independently counted by denomination by two count team members, other than the recorder. The count date and the amounts by denomination are recorded on the Soft Count Card for the table drop boxes and EBT, or the poker jackpot count card for the jackpot drop boxes, by the recorder. The total value of non-cashable chips must be recorded on the Soft Count Card and included in the drop portion of the Master Games Sheet. No counting may take place until all bills from the drop box are sorted by denomination. However, if a currency counter that discriminates by denomination is used, the team may sort into denominations after the dual count. The total count per count card is calculated and compared to a second total physical count conducted by the second count team member. Any discrepancies between these two amounts must be investigated and corrected. When the two counts agree, the total count of currency, chips, tokens, coupons, Mobile ATM receipts and tickets is recorded as the drop amount for that particular table on the Soft Count Card and the Master Games Sheet by the recorder. Through observation of the count, determine compliance with this procedure.

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9. If a licensee has more than one jackpot drop box for a particular award, it must ensure that all boxes are counted and amounts from those boxes are added together to arrive at the incremental change of each respective liability. The increase in the jackpot liability is the total jackpot rake. Through observation of the count, determine compliance with this procedure.

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10. A Soft Count Card is required to be completed for each box unless a currency counter produces an individual tape for each box. In this case, the tape may replace the Soft Count Card. Each tape must reflect the same information required on the Soft Count Card and must be signed by the recorder. If the currency counter tape is used in

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addition to the Soft Count Card, it is attached to the Soft Count Card. Through observation of the count, determine compliance with this procedure.

11. The recorder completes the Master Games Sheet prior to capturing the count team members' signatures. Accounting may complete the AGP and hold percentage calculation on the summary. If accounting completes this information, a different color of ink must be used and the accounting personnel must initial and date next to the appropriate section on the form. Through observation of the count, determine compliance with this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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12. At the end of the count for each shift, two team members independently verify the currency, chips and tokens counted for that shift, one of which can be the recorder. If a currency counter that discriminates and sorts the bills is used, only one count of the currency for the shift is required. If any discrepancies are noted between the final count for the shift and the calculated total for the shift, the funds must be recounted until all discrepancies are resolved prior to transferring the accountability of the count funds to the cashier. Through observation of the count, determine compliance with this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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13. At the completion of the count, all count team members sign the Master Games Sheet attesting to their participation on the count and accuracy of the count funds documented on the paperwork. Additionally, if a currency counter is used, and it produces a summary page of the count, or is used to verify the total count, all count team members must sign and date this page of the currency counter tape. If count paperwork is not printed until the end of the count and a count team member leaves prior to the end of the count a supplemental log may be used to satisfy this requirement. The supplemental log becomes part of the drop paperwork. Through observation of the count, determine compliance with this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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14. One count team member locks the drop box racks containing the empty drop boxes. Another team member physically verifies the drop box racks are securely locked. When the count is complete, the count team leader must ensure that the count keys are returned to the designated locked key boxes pursuant to standard key check in/out procedures. Refer to the Key Control section for additional information. Through observation of the count, determine compliance with this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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15. At the completion of the count, the count team leader and another team member transfer accountability of the funds to the cashier. The cashier verifies the total by independently counting the funds. The cashier accepting the drop proceeds must not have participated in the count. The cashier signs the Master Games Sheets attesting to the accuracy of the monies received, that it agrees to the count paperwork and immediately returns the Master Games Sheets to the count team leader. The count team leader and another team member are present during the cashier verification process. Through observation of the count, determine compliance with this

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

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procedure.

16. If Poker Jackpot Count Cards were completed, the copy (yellow) of the cards must be delivered by a count team member to the cashier who retains them until retrieved by the person designated to update the jackpot liability. Alternatively, a count team member may deliver the copy (yellow) of the Jackpot Count Cards directly to the designated person responsible for updating the liability. Through observation of the count, determine compliance with this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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17. At the completion of the count, the funds are receipted into the cashier cage and the accountability on the Daily Cash Summary is increased. The table games count proceeds may also be secured in the vault and recorded as a vault transfer from the cage to the vault. Through observation of the count, determine compliance with this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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18. At the completion of the count, all keys checked out to complete the count are immediately returned to the corresponding locked key box(s). Through observation of the count, determine compliance with this procedure.

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19. All documents, tickets, coupons and Mobile ATM receipts from the table drop boxes and EBTs and all documents generated during the count to include all ticketing count paperwork, except the copy (yellow) of the Poker Jackpot Count Cards, are immediately forwarded directly to accounting by a count team member. This may be achieved by a count team member placing the documentation in the accounting locked box or by delivering it immediately to accounting personnel after the documents are fully completed and all necessary signatures have been obtained. In no case will these documents be accessible to cashier personnel, except for the express purpose of providing required signatures on gaming documents, and then only in the presence of the count team leader. Through observation of the count, determine compliance with this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**ICMP – TABLE GAMES, SLOT AND KIOSK DROP AND COUNT PROCEDURES - C. SLOT MACHINE DROP AND COUNT**

1. The slot drop and count team members must be rotated on a routine basis. Rotation is such that the teams are rotated a minimum of one drop and one count a month. Rotation is achieved when at least one team member is different. Additionally, at least one team member must be independent of transactions being reviewed, dropped (i.e., this member cannot participate in jackpot payouts, fills, etc.) and the subsequent accountability of the proceeds. Interview drop and count team members to determine their understanding of this requirement and determine compliance with this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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2. Slot drops must be conducted at the scheduled times which have been previously submitted to the Division on the Drop and Count Schedule. Slot drop must commence at the previously designated time; however, drop may commence at any time up to

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one hour after the previously designated time. No such window will be allowed prior to the scheduled slot drop time. Permanent changes to the drop and count time must be submitted prior to the requested change date. Such designation must be made to the Division prior to the gaming day in which changes to drop and count are to take place. Verify the drop starts at the time, or within one hour of the time, submitted to the Division.

3. All unscheduled drops/counts (i.e., temporary changes) must be tracked and documented, in writing, throughout the month. Drop and count team requirements for unscheduled drops and counts are the same as for any regularly scheduled drop and count. Licensees are required to develop, maintain and adhere to a drop plan as defined in Slot Drop Procedures. The slot count must be performed immediately following the slot drop allowing for a reasonable amount of time for break purposes. Verify temporary changes are tracked, documented correctly, and submitted monthly to the appropriate Division email account.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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4. A drop includes removing and not replacing funds from a slot machine. Any time a drop is performed, all statistical reports must be prepared and must accurately reflect metered to actual information for whatever funds are dropped. BV boxes may be dropped more frequently than the coin drop buckets. For example, drops that include only BV contents must have accurate statistical reports that include a comparison of metered bill/ticket/slot coupon drop to actual bill/ticket/slot coupon drop. All applicable statistical reports must be prepared and the Monthly Slot Revenue Summary updated to include the drop period information. The last drop of the month must include both coin and BV drop. Interview drop/count team and accounting staff to determine their understanding of this requirement.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**EMERGENCY DROP AND COUNT PROCEDURES**

1. The licensee must notify the Division that an emergency drop **and** count have been performed by emailing [dor\\_coloradocasinos@state.co.us](mailto:dor_coloradocasinos@state.co.us) within 24 hours of the emergency count, including an explanation justifying the need for the emergency **count**. Emergency counts are subject to the Division's review and may not be performed on a routine basis (i.e. more than one in a month **OR** more than twice a year) to replenish the currency used in the daily operations of the casino. Observe an emergency drop or interview casino personnel to determine their understanding of this requirement. Ensure this requirement is being met.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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2. If funds are to be counted immediately after the emergency drop, meters must be taken at the time of the drop and forwarded to accounting, prior to the count, as support for adjustment(s) on the drop reports. The count team and meter reading requirements, count process, documentation requirements and cashier verification are the same as for a regularly scheduled drop. The drop team requirements for emergency drops are the same as for a regularly scheduled drop. Additionally, meters are to be captured for each drop, including emergency drops. Emergency drops in which funds are not immediately counted are reported to the Division on a monthly

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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basis by emailing [dor\\_coloradocasinos@state.co.us](mailto:dor_coloradocasinos@state.co.us). Observe an emergency drop or interview casino personnel to determine their understanding of this requirement. Ensure this requirement is being met.

3. If the funds are not immediately taken to the count room to be counted, they may be placed in an emergency drop cabinet. The emergency drop cabinet is a single keyed compartment located in the count room, or a two keyed compartment located on the floor under surveillance. If a single keyed cabinet is used, the key is maintained in locked box 1 and/or the Drop Key Box. For a two keyed cabinet, one key is maintained in locked box 1. The second key is maintained in locked box 2 and/or in the Drop Key Box. When these two keys are checked out, two separate licensed individuals must maintain them. Observe an emergency drop or interview casino personnel to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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4. To perform the emergency drop of funds to be placed in the emergency drop cabinet, the drop team checks out the necessary keys, including the emergency drop cabinet key. The coin funds are removed from the machine and placed in a bag. The BV box is also removed from the machine and placed in a bag. The coin bag and BV bag are sealed to prevent unauthorized access. The coin bag and the BV bag are tagged with the machine number, the machine denomination, drop team signatures, the date, and must indicate "drop funds". The tagged coin bag and BV bag are taken to and secured in the emergency drop cabinet. Observe an emergency drop or interview casino personnel to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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5. In the case where the hopper funds are also removed, the hopper funds are bagged and tagged as noted above, except recorded as "hopper funds". Drop funds shall not be commingled with hopper funds. Observe an emergency drop or interview casino personnel to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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6. If the machine remains on the floor and attached to the drop cabinet, the bagged funds may be stored in the drop cabinet and retrieved by the drop team during the next scheduled drop. If the machine is being removed from the floor, the proceeds may be stored in the drop cabinet of a neighboring machine. The funds must be secured at all times until counted in accordance with ICMP count procedures. Observe an emergency drop or interview casino personnel to determine their understanding of this procedure and ensure this requirement is being met.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**RESTRICTED ACCESS TO DROP/COUNT FUNDS**

1. Access to unverified drop/count funds must be restricted to drop and count team members only. All drop funds must be secured from the beginning of the drop process through the time the cashier accepts the funds. Uncounted drop monies must be secured in the count room. No one is allowed access to the count room during the drop team's and count team's break periods. All BV boxes must have a lock to restrict access to the box contents. This lock must be keyed differently than the BV release key. The drop team secures the uncounted buckets and BV boxes by locking

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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the count room. In addition, BV boxes must be secured in a locked rack. Through observation of the drop/count, determine compliance with this procedure.

**METER READINGS**

1. Meters must be captured in conjunction with each drop, immediately before or after the drop and before gaming commences on the slot machine being dropped. Licensees who have successfully tested their gaming system and submitted the acknowledgement letter or who have received written approval from the Division for the use of their gaming system may utilize system meter readings. Licensees without an approved system must manually record the meter readings. If the meters are read manually, the licensed employee responsible for reading the meters must be completely independent of the functions related to the generation and subsequent accountability of any slot related transaction or revenue, independent of the entire drop and count function or have only acted as a verifier on jackpots and fills and not a drop or count team member for the associated drop. The meter readings are transferred to accounting immediately after they are completed. Through observation of the drop/count, determine compliance with this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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2. When the casino is open, the person reading and manually recording meters in conjunction with drop for non-communicating machines, system testing, and/or new machine testing, may enter the drop area as defined in the Licensee's drop plan. Refer to Slot Drop Procedures for drop plan component requirements. The person recording the meters must exit the drop area at the completion of that function. The licensee must establish internal procedures to be able to distinguish the person recording meters from the drop team members. Through observation of the drop/count, determine compliance with this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**SLOT DROP TEAM REQUIREMENTS**

1. The slot drop team consists of a drop team leader, at least one other drop team member, and one or more observers. An observer is a person who is physically present on the floor and observes but does not participate in the drop except to assist the team with the transportation of the drop cart; this must not interfere with their ability to perform the observation function. The observer(s) watches the other drop team members and ensures that all removed drop buckets and/or BV boxes are placed on the cart. The observer(s) guards the cart containing the removed drop buckets and/or BV boxes. A licensee is responsible for meeting these requirements and, based upon the operations, must have procedures in place to ensure no access is allowed to the slot drop funds by non-drop team members or patrons. The slot drop team may consist of the same individuals as the slot count team. Through observation of the drop, determine compliance with this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**DROP KEY PROCEDURES**

1. Drop officially begins when either the slot drop or BV release keys are checked out. The drop team leader escorted by security obtains the drop keys (drop keys do not include the BV content key). The keys must be maintained and secured by the drop

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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team at all times. When the drop is complete or during breaks, the drop team leader must ensure the drop keys are returned to the designated locked key boxes pursuant to standard key check in/out procedures. Through observation of the drop, determine compliance with this procedure.

2. The drop keys include the slot machine drop key, count room key, BV rack key, BV release key, and emergency drop cabinet key(s) (if applicable). In order to access the BV box on some slot machines, the drop team needs access to the slot machine door key. The slot drop team may not use the slot machine door key for any reason other than to drop the machines that require this key to access the BV box. Through observation of the drop, determine compliance with this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**SLOT DROP PROCEDURE**

1. All team members must remain within full view of each other throughout the drop process including transporting the drop buckets and BV boxes from the floor to the count room. While performing slot drop duties, the team members are precluded from performing any other gaming activities. Through observation of the drop, determine compliance with this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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2. A licensee is required to develop, maintain and adhere to a slot drop plan that defines the following:

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- The slot drop area. The slot drop area may be secured with the use of a designated observer(s) and/or distinctly defining the slot drop area with the use of ropes or other such physical segregation.
- procedures to ensure non-drop team members and patrons do not enter the defined slot drop area;
- procedures to adequately and timely secure machines prior to allowing patrons to resume gaming including times when the drop team has been unable to secure the machine;
- procedures for transporting slot drop funds from the machines being dropped to the cart;
- Procedures to ensure slot drop funds are secured while being transported from the casino floor to the count room; and
- the process to ensure the licensee regularly reviews the slot drop process and records any exceptions or variations to their established procedures.

Through observation of the drop determine compliance with this procedure. Confirm that a slot drop plan exists and that the plan incorporates all requirements. Where is the plan located and is the team following the plan?

3. If a patron is playing a slot machine that is being dropped, the patron must be asked to step away from the slot machine and out of the drop area until the drop of the machine(s) is completed. If a patron is playing a slot machine that is in a bonus round, the licensee may drop that machine at the completion of the bonus round so as to not interrupt the play of the bonus round. Through observation of the drop, and

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interview with the drop team members, determine compliance with this procedure.

4. The casino must ensure all coin buckets and BV boxes dropped are associated with the machine in which they are housed. The slot count must immediately follow the slot drop, allowing a reasonable amount of time for break purposes. Through observation of the drop, determine compliance with this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**SCALE MAINTENANCE**

1. The weigh scale located in the count room must be secure and the calibration module sealed in a manner to prevent tampering and is accessible only by the calibrator. If the seal is broken, the scale must be recalibrated by an authorized technician prior to using the scale for count. Interview the casino personnel responsible for the scale to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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2. Whenever the calibration module is accessed, such access must be documented and the documentation signed by the manufacturer's representative and maintained by the licensee. The scale must be secured in a manner to prevent unauthorized access. This can be accomplished by using either a pre-numbered seal or a lock and key. If the licensee uses a pre-numbered seal, a log must be maintained and reconciled, which lists the seal number, when it was applied, who applied it, when it was removed, who removed it, and the reason for scale access. If the licensee elects to secure the scale with a lock and key, the manufacturer or the manufacturer's representative must maintain the key. Alternatively, the key may be maintained in the locked key box(s), with only the manufacturer or manufacturer's representative having authority to obtain the key. The key control log must be completed each time the key is checked out. Interview the casino personnel responsible for the scale to determine their understanding of this procedure. Determine compliance with this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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3. Someone independent of the cashier cage, vault, slot, and count team functions (preferably accounting personnel or internal compliance officer) is required to be present whenever the calibration module is accessed. Interview the casino personnel responsible for the scale to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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4. The proper operation and maintenance of the weigh scale is the responsibility of each licensee. Employees operating weigh scales must be familiar with the proper operation procedures for their scale. In addition, they must be familiar with factors that may interfere with the accuracy of the scale. Interview the casino personnel responsible for the scale to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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5. The licensee's internal auditors or someone who is independent of the cashier cage, vault, slot department, and count team, at least on a quarterly basis shall test the weigh scale. The test results must be documented. Interview the casino personnel responsible for the scale to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**SLOT COUNT TEAM REQUIREMENTS**

1. The slot count team consists of a count team leader and at least two other count team members. One of the three team members must be the recorder. Through observation of the count, determine compliance with this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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2. One count team member must obtain all the necessary documents to perform the count. At all times during the count, team members must be aware of the actions of the other team members to ensure safeguarding of the assets and reducing the risk of theft. The team members must be in view of each other and the funds. Through observation of the count, determine compliance with this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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3. Prior to the count, the count team checks out the necessary keys to conduct the slot machine count. The count keys include the count room key, BV rack key, and BV content key. If emergency drops were conducted during the drop period, the count team may need to also check out the restricted key(s) to the cabinet containing the bags and BV box(s) dropped during the emergency drop(s). If the count team uses "test money", which is a predetermined amount of money and/or tickets, and the test money is maintained in the count room in a sealed compartment for the purpose of testing the currency counter, the count team also obtains the key to access the test money. Through observation of the count, determine compliance with this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**COIN COUNT PROCEDURES**

1. Prior to running each denomination through the count machine, a team member must test the machine with a predetermined number of coins or calibration weights. Another team member records the number of coins or amount/weight used to test the machine, number of coins or amount/weight counted by the machine, and any discrepancies. Both team members sign the Slot Summary Report to document the testing process. In the event that the scale is not functioning properly, the licensee must document the event. Through observation of the count, determine compliance with this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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2. The contents of each slot machine's drop bucket must be counted. The recorder must ensure the funds from the buckets are attributed to the correct machine. The recorder ensures the amount of drop per machine, total for each denomination, and the grand total is documented on the Slot Summary Report. Through observation of the count, determine compliance with this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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3. If a weigh/scale tape is produced, the count team members sign and date the tape when the weigh/count is complete. Through observation of the count, determine compliance with this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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4. The coin is wrapped and/or bagged. During this process, at least two team members must be present. When the wrapping or bagging of coins and tokens is complete, the recorder counts all the wrapped or bagged coin and records the results by

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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denomination on the Count (Weigh)/Wrap Variance Report and Slot Summary Report. Variances between the weigh ad the wrap or bags count are calculated and documented on the Count (Weigh)/Wrap Variance Report ans Slot Summary Report. The count team must investigate variances of 1% or more for coin by denomination and total and the results of the investigation must be documented. At least one team member, in addition to the recorder, must independently recount the wrap and verify the total on the Slot Summary Report. Through observation of the count, determine compliance with this procedure.

5. All team members must sign the Slot Summary Report and Count (Weigh)/Wrap Variance Report as evidence of participation on the count team. If count paperwork is not printed until the end of the count and a count team member leaves prior to the end of the count a supplemental log may be used to satisfy this requirement. The supplemental log becomes part of the drop paperwork. The count team leader signs the Slot Summary Report as a team member and the count team leader must sign the certification section of the Slot Summary Report, certifying the transfer of the proceeds to the cashier. Through observation of the count, determine compliance with this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**BILL COUNT PROCEDURES**

For the purpose of this subsection only, any reference to tickets also includes slot coupons.

1. The contents of each box must be individually counted and the funds must be attributed to the proper machines. These uncounted funds must be easily distinguishable by surveillance at all times and protected to ensure the funds are not misplaced, lost, misappropriated, or left uncounted. Under no circumstances may the funds from multiple boxes be commingled prior to the individual box count. Through observation of the count, determine compliance with this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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2. The counting of the boxes may be accomplished by opening, extracting, and counting the contents of one box at a time, or opening multiple boxes at one time as long as the funds are physically segregated to prevent commingling of the funds until the contents of each box are individually counted. Examples of adequate physical segregation include, rubber banding individual box contents with the box designation, utilizing a divided container to hold the funds and the box designation for each box, funds placed in a clear container using an automated count machine's header cards to distinguish the contents of each box. Through observation of the count, and determine compliance with this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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3. The opener removes the funds from the BV box, and shows the verifier and surveillance that the box is empty. The verifier acknowledges that the box is empty. The acknowledgment must be obvious when reviewing surveillance, such as looking at the box and nodding the head. Through observation of the count, determine compliance with this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**ICMP Compliance Checklist: Section 5, TABLE GAMES, SLOT AND KIOSK DROP & COUNT PROCEDURES**  
**For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

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4. A count team member other than the recorder performs the first count of the money. Through observation of the count, determine compliance with this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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5. The recorder does not participate in counting the contents of the individual BV boxes. The recorder's duties are to ensure the proper recording of the BV contents and attributing them to the correct slot machine. Through observation of the count, determine compliance with this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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6. The recorder calculates and records the dollar amount of each denomination, and the dollar amount of the tickets (if applicable), on the BV Summary for each BV box. If the currency counter tape is used in addition to the BV Summary, it is attached to the BV Summary form and only grand totals must be entered on the BV Summary. Through observation of the count, determine compliance with this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**NOTE:** If a licensee utilizes an automated count machine, one which links the funds to the proper slot machine via scanning a count machine header card, the recorder is the individual that operates the counter and ensures that any rejected bills or tickets are attributed to the correct slot machine.

7. If a currency counter that discriminates bill denominations is used, a verification of the first count is not required. Otherwise, the verifier performs an independent second count of the bills and tickets for each BV box. The verifier verbally compares this amount with the recorder's amount. If there are any discrepancies between these two amounts, the verifier must recount the bills and/or tickets and the recorder must recalculate the amounts on the BV Summary. This procedure must be performed until all discrepancies are resolved. BV boxes must be secured upon completion of the individual BV box count. Through observation of the count, determine compliance with this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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8. At the end of the individual BV box count, all monies and tickets counted are independently counted by two count team members, one of who can be the recorder. Through observation of the count, determine compliance with this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**NOTE:** If a currency counter that discriminates bill denominations is used, only one count of all monies for all boxes is required; otherwise, two separate counts must be performed.

9. If a licensee utilizes an automated count machine that performs a dual count (one by box and one in total) in one pass, then a count in total is not required; however, verification is required to replace the count in total. This is achieved by performing a bulk (brick, strap and loose) verification and comparing that total to the automated counter grand total. This total is traced to the total on the BV Summary. Through observation of the count, determine compliance with this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

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10. If any discrepancies are noted between the counts, bills, tickets and slot coupons must be recounted until all discrepancies are resolved prior to transferring the count to the cashier. Through observation of the count, determine compliance with this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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11. All team members must sign the BV Summary attesting to their participation in the count. If count team members leave the room prior to the completion of the count, they must sign the BV Summary attesting to their participation in the count. If count paperwork is not printed until the end of the count and a count team member leaves prior to the end of the count a supplemental log may be used to satisfy this requirement. The supplemental log becomes part of the drop paperwork. The count team leader signs the BV Summary as a team member and the count team leader must sign the certification section of the BV Summary, certifying the transfer of the proceeds to the cashier. Additionally, if a currency counter is used and it produces a summary page of the count, or is used to verify the total count, all count team members must sign and date this page of the currency counter tape. Through observation of the count, determine compliance with this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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12. At the completion of the count, the count team leader and another team member transfer accountability of the drop proceeds (coin and currency) to the cashier. See Cashier Verification Process subsection. Through observation of the count, determine compliance with this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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13. At the completion of the count, all keys checked out to complete the count are immediately returned to the corresponding locked key box(s). Through observation of the count, determine compliance with this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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14. All documents from the count are immediately forwarded directly to accounting by a count team member. This may be achieved by the count team member placing the documentation in the accounting locked box or by delivering it immediately to accounting personnel after the documents are fully completed and all necessary signatures have been obtained. In no case will these documents be accessible to cashier personnel, except for the express purpose of providing required signatures on gaming documents, and then only in the presence of the count team leader. Through observation of the count, determine compliance with this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**TITO COUNT PROCEDURES**

Tickets and coupons redeemed at the TITO devie are dropped and counted as part of the regular slot drop and count procedures or table games. For the purpose of this subsection only, any reference to tickets also includes coupons.

1. Prior to running tickets through the count machine, the machine must be tested by two count team members with a predetermined number of and/or dollar value of tickets to ensure accuracy of the machine. Each function of the count machine must be tested. If the count machine counts the number of tickets, then the number of

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

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tickets is tested. If the count machine counts the dollar value of the tickets, then the dollar value of the tickets is tested. The team members record the number and/or dollar value of tickets used to test the count machine, the number of and/or dollar value of tickets counted by the count machine, and any discrepancies. This test is documented on the BV Summary Report. Both team members sign the BV Summary to certify the testing process. In the event the count machine is not functioning properly, the licensee must document this event and attempt to resolve the malfunction. Through observation of the count, determine compliance with this procedure.

2. Each BV must be individually counted and the tickets attributed to the TITO device that redeemed the tickets. The tickets and bills from the BV must be separated. This can be done by manually sorting the tickets and bills, or by running the bills and tickets through a count machine that distinguishes between the two. If the count machine can only provide the number of tickets in addition to the bill count for each slot machine, the tickets for each slot machine must be kept separate until counted. This can be accomplished by writing the slot machine number on the last or first ticket for that machine's stack of tickets, placing a divider (with the slot machine number) between each batch of tickets, or in a similar fashion which ensures the tickets are not commingled prior to the count of the tickets. Through observation of the count, determine compliance with this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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3. The count team **must produce a piece count and a dollar amount** of the tickets by TITO device and grand total. The counts by TITO device must be documented and the count team members must sign all such documentation. This can be accomplished by documenting the counts on the BV Summary, a currency counter tape, a calculator tape, or a ticketing system report generated by the count team. The tickets can be counted in the following ways:

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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- Manually by recording each ticket,
- Manually by utilizing a calculator tape,
- A currency counter machine that can read the ticket's bar code and produce a tape,
- A currency counter machine that can count the number of tickets and produce a tape,
- A scanner that can read the ticket's bar code and produce a tape or report,
- Entering the validation number from the ticket's bar code and producing a tape or report.

Through observation of the count, determine compliance with this procedure.

**NOTE:** It may be necessary to combine any of the above to produce both the piece count and the dollar amount.

4. If the licensee utilizes a count machine that communicates with the TITO system, and compares the tickets the system has recorded with the tickets counted during the

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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count process, the tickets only need to be counted or scanned once by the count team members. Through observation of the count, determine compliance with this procedure.

5. If the licensee does not utilize a count machine that communicates with the TITO system, the count team must perform two independent counts of the tickets. If there are any discrepancies between these two counts, the count team must investigate and document the results. Interview casino personnel responsible to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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6. The recorder verifies the TITO device number and ticket amounts (piece count and dollar amount) were recorded or captured correctly during the first count. Through observation of the count, determine compliance with this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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7. Any problems encountered with the ticket count process must be documented by the count team and forwarded to accounting immediately following the count process. Interview casino personnel responsible to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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8. The count team must produce the system generated Tickets from Slot Device Counted by Count Team Report. If the count machine is not functioning correctly, the count team must perform a manual count of the tickets. When the tickets are counted manually, two independent counts of the tickets are required, one by the opener and one by the verifier. Interview casino personnel responsible to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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9. All team members must sign all the paperwork produced by the count team regarding the counting of the tickets, i.e. counting machine tapes, system reports, calculator tapes, BV Summary Reports, etc. All ticketing count paperwork and tickets are immediately forwarded to accounting by a count team member at the conclusion of the count. Through observation of the count, and review of paperwork generated by the count team, determine compliance with this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**ICMP – TABLE GAMES, SLOT AND KIOSK DROP AND COUNT PROCEDURES - D. KIOSK DROP AND COUNT**

**The kiosk drop and count procedures outlined below are in addition to the procedures outlined for the slot drop and count.**

**DROP**

1. Accounting personnel are prohibited from participating in the kiosk drop and/or count. A minimum of three licensed employees are required to perform the kiosk stacker drop. At least one drop team member must be independent of the kiosk transactions. For the purpose of this subsection only, any reference to tickets also includes slot coupons. Ensure compliance with this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**ICMP Compliance Checklist: Section 5, TABLE GAMES, SLOT AND KIOSK DROP & COUNT PROCEDURES**  
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2. Kiosk stacker drops may be performed in conjunction with the licensee's slot machine drop, or more frequently, at scheduled times that have been previously submitted to the Division on the Drop and Count Schedule (see form in the Drop and Count section). Kiosk drop must commence no more than one hour after the scheduled times submitted to the Division on the Drop and Count Schedule. All unscheduled drops/counts (i.e., temporary changes) must be tracked and documented, in writing, throughout the month. Ensure compliance with this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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3. Stackers must be dropped and secured in such a manner that access is restricted to authorized members of the drop and count teams through appropriate key controls. Access to the contents of the stacker is limited to the count team until the count is ready to be transferred to the cashier cage. Stacker racks shall be located in a locked and secured area where access is restricted. Through observation of the drop/count, determine compliance with this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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4. Any time a kiosk drop is performed and prior to any transactions being processed through the kiosk, someone independent of the count must run a kiosk report that reflects the total value of all tickets accepted by the kiosk, referred to as the Total In, and the total value of all payments issued by the kiosk, referred to as the Total Out. This report is immediately forwarded to accounting. This report must not be accessible to the count team. Through observation of the drop, determine compliance with this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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5. On at least a monthly basis the cassettes and hopper funds must be removed from the kiosk and counted. Two licensed employees must count the funds. The count may be performed in the count room or the cage. This count is used for the kiosk reconciliation. Refer to ICMP Section 8, H Ticket In/Ticket Out and Slot Coupons, for ticket redemption kiosk reconciliation requirements. The cassettes and hoppers are then filled or replaced with an imprest amount and placed in the kiosk. Through observation of the count, determine compliance with this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**COUNT**

1. Three count team members are required to perform the kiosk stacker count. The count team members are rotated on a routine basis. Rotation of count team members must be such that the count team does not consist of the same three individuals for more than five consecutive counts. Observe a kiosk count or interview casino personnel responsible for kiosk counts to determine their understanding of this procedure and determine compliance with this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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2. The count must be completed in the count room. The count can be performed daily or in conjunction with the slot machine counts. See TITO Count Procedures above for ticket counter testing and ticket count procedures. Ensure the count is completed in the count room.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**ICMP Compliance Checklist: Section 5, TABLE GAMES, SLOT AND KIOSK DROP & COUNT PROCEDURES**  
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3. The count team must produce the system generated Tickets from Kiosk Counted by Count Team Report. The design of the Kiosk Count Form is at the licensee's discretion; however, at a minimum, the Kiosk Count Form must include the same information that is required on the BV Summary. Ensure the Kiosk Count Form meets the ICMP requirements.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**ICMP – TABLE GAMES, SLOT AND KIOSK DROP AND COUNT PROCEDURES - E. HOPPER DROP AND COUNT**

1. The standard drop and count requirements discussed above apply to hopper drops and counts, except that a hopper summary report is used instead of the slot summary report. Interview casino personnel responsible for hopper drop/counts to determine their understanding of this procedure and different form used.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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2. Proper support for, and documentation of, all hopper adjustments must be maintained. If the hopper drop and count is performed at the same time a regular drop and count is conducted, then the licensee must not commingle hopper funds with any other funds. The funds, as well as corresponding accountability, must remain separate. Observe a hopper drop/count or interview casino personnel responsible for hopper drop/counts to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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3. Hopper adjustments must be made when the denomination of the hopper is changed for a machine, when the machine's ticket functionality is activated, when moving a machine from one establishment to another establishment (i.e., different licensee, off-sight storage, etc.), when there is a change in ownership (i.e., when a new license is issued), when a business closes, or when the machine is removed from the floor. Interview accounting personnel to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**Additional Comments:**

Review Recap		
	<i>Initial Review</i>	<i>Follow-up</i>
(1) Total items tested	_____	_____
(2) Total noncompliance items	_____	_____

**ICMP Compliance Checklist: Section 8, TICKET IN/TICKET OUT, PURCHASE TICKETS AND SLOT COUPONS**  
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Licensee Name	<b>Review Recap</b>		
Prepared By			
Period Reviewed (ICO Use Only)		Initial Review	Follow-up
Date & Time Completed	(1) Total items tested		
Date Follow-up Performed	(2) Total noncompliance items		

**DIVISION OF GAMING USE ONLY**

Employee Signature & License #

Casino Manager Signature & License #

**ICMP – TICKET IN/TICKET OUT, PURCHASE TICKETS AND SLOT COUPONS - A. GENERAL**

Refer to Rule 12 in the Colorado Limited Gaming Regulations for regulations related to ticketing and slot coupons.

1. Tickets, purchase tickets and coupons may only be accepted at the casino from which they were purchased or issued. Tickets and coupons shall only be redeemed at the cashier cage, via a wireless handheld validation unit, via table games validation unit, kiosk, EBT or TITO device to ensure the system verifies the transaction at the time of the redemption.

C	N	2C	2N
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**On-line Tickets and Delayed Tickets**

1. The licensee is responsible for having detailed written procedures in the cashier cage which indicate which type of method is going to be used when the system is non-communicating (delayed or off-line tickets), which include procedures for validating offline tickets, payment of delayed tickets by cashier, the process required to ensure the tickets are redeemed through the system once communication has been restored, and any applicable reports. Delayed and off-line tickets can only be honored and redeemed through the cashier cage.

C	N	2C	2N
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**Tickets or Coupons as Tips**

1. Licensees that allow their employees to accept tickets or coupons as tips, must adhere to the following:
  - a. Ensure the ticket or coupon was accepted as a tip, and not removed from an unoccupied machine, found on the gaming floor, or disbursed from a slot machine as a result of machine testing.
  - b. Tip tickets or coupons are only redeemed at the cashier's cage or a table game.
  - c. The cashier's cage must segregate tip tickets and coupons from non-tip tickets and coupons, and indicate as such on the Daily Cash Summary.
  - d. Dealers may accept a ticket as a tip as long as the table has the ability to issue and redeem tickets at the table. Upon receipt of the ticket, the dealer must immediately notify the pit supervisor, and drop the ticket in the dealer's tip box. The cashier

C	N	2C	2N
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**ICMP Compliance Checklist: Section 8, TICKET IN/TICKET OUT, PURCHASE TICKETS AND SLOT COUPONS  
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redeems these tickets and exchanges them for currency when counting dealer tips.

Ensure the procedures were followed for tickets or coupons accepted as tips.

**Tickets or Coupons Redeemed for Patrons**

1. Licensed employees may redeem tickets or coupons for patrons. The ticket or coupon must only be redeemed at a cage or via a wireless handheld validation unit. The ticket or coupon may not be redeemed at a kiosk or slot machine. If the licensed employee takes the ticket or coupon to the cage for redemption, the patron must initial and date the back of the ticket or coupon. Interview the casino personnel to ensure their understanding of these requirements.

C	N	2C	2N
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**Expiration**

1. Tickets expire 120 days after issuance. Expired tickets are not valid for gaming tax purposes. If the licensee chooses to honor an expired ticket, the payment shall be considered promotional and is not deductible for gaming tax purposes. Evidence of payment for an expired ticket must be visible on the upper right hand corner of the expired ticket (e.g., "Paid Expired" or "Pd Exp", etc.). Ensure compliance with this requirement.
2. Coupons must have an expiration date. Coupon payments are considered promotional and not deductible for gaming tax purposes. Ensure this requirement is met.
3. Purchase tickets must have an expiration date of a minimum of 120 days, and not deductible for gaming tax purposes.

C	N	2C	2N
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C	N	2C	2N
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**Retention**

1. All tickets must be retained until the Division has issued approval to rely upon the ticketing module. After receiving approval, tickets and redeemed coupons in the possession of the licensee must be retained for at least 60 days from date of redemption, expiration or void. Ensure compliance with this requirement.
2. Tickets and coupons must be destroyed in a manner that precludes them from being used inappropriately. Non-licensed gaming employees may perform the ticket destruction. Document in the space provided below how tickets are currently destroyed.

C	N	2C	2N
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C	N	2C	2N
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**ICMP – TICKET IN/TICKET OUT, PURCHASE TICKETS AND SLOT COUPONS - B. FLOOR OPERATIONS**

1. Prior to offering TITO devices for patron play, a TITO device checklist must be completed for each TITO device. The checklists must be maintained by the licensee and made available to the Division upon request. Randomly select five TITO devices and ensure a device checklist was completed prior to the machine offered for play.

C	N	2C	2N
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**ICMP Compliance Checklist: Section 8, TICKET IN/TICKET OUT, PURCHASE TICKETS AND SLOT COUPONS**  
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2. Ticket paper stock used for TITO devices, EBT's and ticket printers in the pit shall be stored in a secure location to prevent unauthorized access, tampering, or theft. Ensure ticket paper stock is secured adequately.

C	N	2C	2N
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3. The licensee must have procedures in place to ensure that tickets are loaded correctly to avoid a blank ticket being issued. In the event of a blank ticket, alternative procedures must be in place to ensure accurate accountability for the ticket. Observe the process of placing ticket stock into a TITO device. Interview slot department and cashier cage employees to ensure their understanding of the procedures required when a blank ticket is printed.

C	N	2C	2N
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4. The licensee must ensure that TITO devices do not issue any other type of ticket (e.g., jackpot ticket). In the event that the TITO device produces any other type of ticket, the licensee must immediately investigate the machine, disable this functionality, and contact the Division. Inquire of the Slot Department and cashier cage if any other type of ticket has been issued. Document in the space provided below the procedures that will be used to investigate the machine, disable the functionality and notify the Division.

C	N	2C	2N
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5. The Slot Department must ensure that new devices added to the floor that are not ticket enabled do not accept tickets. Interview slot personnel regarding their procedures for new devices.

C	N	2C	2N
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**Rejected Tickets**

1. Tickets or coupons rejected by a TITO device should be investigated using the following criteria:
- Review the ticket event log/history log of the issuing device (this does not apply to coupons),
  - Review of the status of the ticket or coupon at the cashier cage, and
  - Research the ticket or coupon event information provided by the system (performed by someone with supervisory authority).

C	N	2C	2N
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Ensure compliance with this requirement.

**Voided Tickets**

1. If the device prints a voided ticket in the course of normal gaming activity, the ticket must be forwarded to accounting. The slot attendant must sign the back of the ticket prior to dropping the ticket in the locked accounting box. Ensure compliance with this requirement.

C	N	2C	2N
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**Non-Value/Non-Valid Tickets**

1. Following printer tests, power loss/surges and loss of communication, etc., the printing devices may print tickets that are not valid. These tickets may contain the notation "void", "void demo", "demo", or some other working to indicate the ticket is not a valid ticket. These tickets have no value even if there is a dollar amount printed on the ticket. The

C	N	2C	2N
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Revised August 2022

Effective November 2022

# ICMP Compliance Checklist: Section 8, TICKET IN/TICKET OUT, PURCHASE TICKETS AND SLOT COUPONS

## For Use by Division of Gaming and Independent Compliance Officers (ICOs)

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licensee must have procedures in place to ensure these tickets are adequately disposed of and to ensure they are not included in the calculation of AGP. If a valid ticket is issued after one of these events, the ticket is processed as normal. Interview the Slot Department and/or cashier cage to determine their understanding of non-value or non-valid tickets.

### Ticket Jams

1. In the event of a ticket jam, where the ticket fully printed and did not eject from the printer, the ticket may be removed and handed to the patron. In the event of a ticket jam, where the ticket is partially printed, the ticket must be taken to the cashier cage for redemption. If the ticket cannot be redeemed at the cage, further procedures must be performed to ensure the ticket is valid. Ticket jams are considered a defined event; therefore, the slot machine access log must be completed when accessing the machine. EBT's must have an access log that is completed when accessing the EBT. Observe how ticket jams are handled and ensure the slot access log is completed.

C	N	2C	2N
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### Duplicate Tickets

1. In the event of a duplicate ticket being printed at the gaming device, the slot attendant must write "DUPLICATE" on the ticket and takes the ticket to the cashier cage for the cage to be forward to accounting. If the duplicate ticket is printed in the pit, the dealer must write "DUPLICATE" on the ticket and drop the ticket in the drop box. Only one copy of the ticket should be redeemed and paid. The "Duplicate" ticket should not be redeemed and is not deductible for gaming tax purposes. Ensure compliance with this requirement.

C	N	2C	2N
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### Duplicate Validation Numbers

1. In the event a ticket is produced with a validation number that was previously issued, it should not be able to be redeemed in the system. The ticket validation number should be researched (e.g., review of the game ticket history, a system report that provides confirmation of the validation number, sequence number and amount, etc.) prior to payment of the ticket to ensure the ticket is valid. If the ticket is found to be valid but cannot be redeemed in the system the ticket may be paid to the patron and the amount of the ticket deducted in the calculation of gaming revenue. All documentation including the research performed that supports the deduction must be maintained as support for the payment and provided to the Division upon request. Interview the slot department or cashier cage to determine their understanding of this requirement.

C	N	2C	2N
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### Loss of Communication

1. If the TITO device does not generate a ticket for the last ticket out transaction due to loss of communication, the last ticket out transaction and all subsequent cash out attempts must result in a hopper pay, a hand pay or a payment out of the table tray to the patron until communication is restored. For slot machines, the Slot Department must pay the patron per jackpot payout/fill procedures as outlined in the Slots section of the ICMP. For EBT's, a technician must pay the patron as a short pay with the funds from the cashier cage. The

C	N	2C	2N
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For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

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casino must have procedures in place to ensure any short pays paid to the patron are included in the hold calculation. In the event a ticket is printed after communication has been restored, the licensee must ensure the ticket is not a duplicate ticket. If the delayed or off-line ticket functionality is enabled, the licensee must ensure that the manufacturer specified procedures are followed and the tickets are redeemed through the system. Interview the slot department and/or cage to determine their understanding of this requirement.

**ICMP – TICKET IN/TICKET OUT, PURCHASE TICKETS AND SLOT COUPONS - C. CASHIER CAGE**

**Purchase Tickets**

1. Casinos issuing purchase tickets must have a printer in the cashier cage to issue tickets.
2. The cashier will accept the funds and print a purchase ticket through the casinos approved gaming system.
3. If each cashier is assigned to a separate device that can issue purchase tickets, the cashier may log onto the device for a discrete session or work shift, and validate tickets or coupons for the duration of the session. Under these circumstances, no other individual may use the printer without first terminating the existing cashier's session, and logging in separately. Multiple cashiers may have access to the same device as long as each cashier issues their purchase ticket under their login for their session. AT NO TIME may a cashier or supervisor use any other cashier's session or login.

C	N	2C	2N
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C	N	2C	2N
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C	N	2C	2N
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**Validation and Redemption Procedures**

1. Casinos offering TITO devices must have at least one validation unit that must be located in a cashier's cage. If two or more cashiers share a validation unit, the validation unit must be configured to specify each cashier's identification by requiring all cashiers who redeem and pay tickets or coupons to sign onto the unit before processing any tickets or coupons, so that each ticket or coupon is associated with a specific cashier. If each cashier is assigned to a separate validation unit, the cashier may log onto the validation unit for a discrete session or work shift, and validate tickets or coupons for the duration of the session. Under these circumstances, no other individual may use the validation unit without first terminating the existing cashier's session, and logging in separately. Multiple cashiers may have access to the same validation unit as long as each cashier redeems their tickets or coupons under their login for their session. AT NO TIME may a cashier or supervisor use any other cashier's session or login. Ensure this requirement is met.
2. When a supervisor is performing cashier duties and they process a ticket or coupon transaction that requires an additional level of access, the supervisor who initiated the transaction cannot be the same person who completes the transaction. If the system does

C	N	2C	2N
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C	N	2C	2N
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not provide this differentiation, the licensee must have written procedures in place to provide for this segregation of duties. Review the cashier cage procedures to ensure adequate segregation of duties.

3. Prior to paying a ticket or coupon, the cashier must verify the validity of the ticket or coupon through and in the system. To redeem a ticket or coupon, the validation number is entered into, or the bar code scanned into, the validation unit. If the ticket or coupon is valid for redemption, the cashier pays the patron the appropriate amount and retains the redeemed ticket or coupon for cage accountability. In the event the ticket or coupon is not redeemable, the cashier must notify the gaming manager. Observe the cashier pay out TITO tickets and coupons. Ensure compliance with the above procedures.

C	N	2C	2N
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4. In the event of system failure, the licensee must have written procedures in place to verify the validity of any tickets, purchase ticket or coupons and the subsequent payment of such tickets, purchase tickets and coupons. Review the cashier cage's written procedures to ensure compliance.

C	N	2C	2N
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5. Tickets, purchase tickets or coupons paid during a period of system failure without system validation must have its status in the system changed from active to redeemed/inactive when the system resumes operation; however, no later than the end of that cashier's shift. These tickets, purchase tickets or coupons must be segregated from the redeemed tickets, purchase tickets and coupons until such time as the tickets, purchase tickets or coupons have been redeemed through the system. If the system does not resume functionality by the end of the cashier's shift, the cashier must segregate the tickets, purchase tickets and coupons and enter the amount on the Daily Cash Summary as "paid unredeemed tickets, purchase tickets or coupons" and forward the tickets, purchase tickets and coupons with the paperwork to accounting. For systems that do not provide for a means to change the status of a ticket or purchase ticket from active to redeemed, the licensee must have procedures in place to establish the validity of the ticket before payment is made. The licensee must maintain documentation to support the validity of these tickets. **If during this process it is determined that a duplicate ticket or invalid ticket was paid, the amount paid must be considered promotional funds, and cannot be deducted from AGP.** Review a sample of tickets or coupons paid during a period of system failure. Ensure the tickets or coupons were redeemed in the system once the system resumed operation. Ensure duplicate tickets and invalid tickets or coupons paid are not included as a deduction on the gaming tax return.

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6. Cashiers that are presented with a ticket or coupon that an employee has received as a tip must review it to ensure that it has been issued from their casino. Upon verification of the ticket or coupon, it is redeemed through the system. Tickets or coupons received as tips must be segregated and indicated as such on the daily cash summary.

C	N	2C	2N
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7. Payment of lost, stolen, or mutilated tickets, purchase tickets or coupons that cannot be validated by the system requires the involvement of supervisory personnel to investigate the validity of the ticket, purchase ticket or coupon.

C	N	2C	2N
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8. If a taxable jackpot is won as a result of a wager on a TITO device, a jackpot slip is completed in accordance with normal jackpot procedures. Ensure all taxable jackpots are processed by use of a jackpot slip and not a ticket.

C	N	2C	2N
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**Found Tickets or Coupons**

1. Found tickets, purchase tickets or coupons are receipted into the cage and documented on a miscellaneous receipt form or a ticket/purchase ticket/coupon tracking log. Documentation on the form/log must include the date and time the ticket was found, the location, the amount of the ticket, purchase ticket or coupon, as well as the signatures required on a miscellaneous receipt form. However, tickets or coupons with a \$1.00 value or less may be summed and included on one miscellaneous receipt or one line on the tracking log with the location of "various". Found tickets, purchase tickets or coupons are forwarded to accounting and documented on the daily cash summary as a miscellaneous receipt and miscellaneous disbursement. The status of the ticket or coupon must remain unredeemed until claimed by the patron or until the ticket or coupon has expired. Found tickets cannot be used for testing devices. Review the Daily Cash Summary and supporting documentation to ensure found tickets are processed properly.

C	N	2C	2N
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**Void Tickets or Coupons**

1. To void tickets or coupons, the cashier clearly marks "VOID" on the ticket or coupon. The cashier and slot attendant sign and date the ticket or coupon and the cashier submits them to accounting for retention and accountability. Voided tickets or coupons are segregated from other tickets and coupons and must be submitted to accounting with the cage paperwork. At no time will cashiers or slot attendants void or expire a ticket or coupon in the system. Accounting is the only department with the authority to perform this function. Ensure voided tickets are processed properly.

C	N	2C	2N
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**Duplicate Tickets**

1. The cashier shall not redeem duplicate tickets. A patron will not be able to redeem their valid ticket if a duplicate of that ticket was previously redeemed. The validity of the ticket must be researched prior to payment to the patron. If the ticket is found to be valid it is deductible for gaming tax purposes; however, if the ticket is paid and later found to be invalid the payment is considered promotional. The cashier submits duplicate ticket to accounting for retention and accountability. Ensure duplicate tickets are processed properly.

C	N	2C	2N
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**Test Tickets**

1. Money is disbursed from the cage on a miscellaneous disbursement form when the slot department performs machine testing for variance investigations, new machine testing, new EBT testing, and possible machine malfunctions. Observe the testing of TITO devices and interview the cashier to ensure procedures are followed.

C	N	2C	2N
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2. It is appropriate for test tickets, from the testing of the TITO device, to be redeemed at the cage. When test tickets are receipted back into the cage, a "miscellaneous receipt" form must be completed. This will allow the cage to balance as no money is leaving the cage at the time test tickets are redeemed. Tickets redeemed as a result of testing are segregated and forwarded to accounting with the cage paperwork. Found tickets cannot be used for testing devices. Observe the testing of TITO devices and interview the cashier to ensure procedures are followed.

C	N	2C	2N
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**Tickets or Coupons as Tips**

1. In the event a cage cashier accepts tickets or coupons as tips during their shift, a supervisor must be present at the time the cashier redeems them and must also sign and date them. The cashier's cage must segregate tip tickets and coupons from non-tip tickets and coupons and indicate as such on the daily cash summary. Ensure compliance with this requirement.

C	N	2C	2N
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**Status of Manually Redeemed Tickets or Coupons**

1. Licensees must have adequate controls/procedures for changing the status of tickets or coupons that have been manually paid at the cage, but are still reflected as active/unredeemed in the system. The status of such tickets or coupons must be changed from active/unredeemed to inactive/redeemed. These must be controlled and processed in a manner that precludes any individual(s) from fraudulently initiating and/or completing a redemption request, fraudulently obtaining the funds, and misappropriating the funds. At no time shall the licensee change the status of the tickets or coupon from expired, void, inactive/redeemed to active/unredeemed. Any expired, voided, or inactive tickets the licensee chooses to manually pay may be paid from promotional funds. However, they are not deductible for gaming tax purposes. Ensure compliance with this requirement.

C	N	2C	2N
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**Reporting**

1. At the end of each shift, a report must be printed that details the tickets and coupons redeemed by that casino employee (cage or table game) during their shift. The same report or a separate report must list all tickets purchased by the cashier during their shift. The casino employee will use the report(s) to reconcile to the cash drawer. The casino employee forwards this report to accounting with the cage paperwork including all tickets or coupons for that shift. Ensure this report is produced correctly.

C	N	2C	2N
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**ICMP Compliance Checklist: Section 8, TICKET IN/TICKET OUT, PURCHASE TICKETS AND SLOT COUPONS**  
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**ICMP – TICKET IN/TICKET OUT, PURCHASE TICKETS AND SLOT COUPONS - D. COUNT PROCEDURES**

See ICMP Compliance Checklist: Section 5, SLOT DROP AND COUNT

**ICMP – TICKET IN/TICKET OUT, PURCHASE TICKETS AND SLOT COUPONS - E. ACCOUNTING PROCEDURES**

The licensee must review the Accounting section in the ICMP for ticketing, purchase tickets and coupon information, reports and reconciliation processes.

**Meters**

1. TITO devices must have a “Voucher Out” or “Ticket Out” meter that accumulates the total value of all tickets issued by the device. Ensure compliance with this requirement.
2. TITO devices must have a “Voucher In” or “Ticket In” meter that accumulates the total value of all tickets and slot coupons redeemed by the device. Ensure compliance with this requirement.

C	N	2C	2N
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C	N	2C	2N
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**Void Tickets and Coupons**

1. Tickets or coupons to be voided from the cashier cage are forwarded to accounting for retention and accountability. Accounting must verify these and ensure they are properly signed and dated. Only after accounting has determined that the ticket or coupon should be voided can accounting proceed to void them from the system. Ensure accounting has determined the ticket or coupon should be voided before it is removed from the system.
2. If the machine prints a voided ticket in the normal course of gaming activity, the ticket must be forwarded to accounting by being dropped in the locked accounting box. Accounting must verify the reason for the voided ticket and ensure the ticket is voided from the system. Ensure accounting verifies the reason for the voided ticket and ensures the ticket is removed from the system.
3. Accounting must ensure that voided tickets are not deducted for gaming tax purposes. Interview accounting personnel to determine their understanding of this requirement.

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C	N	2C	2N
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C	N	2C	2N
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**Non-Value/Non-Valid Tickets**

1. Following printer tests, power loss/surges, loss of communication, etc., the printing devices may print tickets that are not valid. These tickets may state on them “void”, “void demo”, “demo”, or some other wording to indicate the ticket is not a valid ticket and the ticket has no value even if there is a dollar amount printed on the ticket. The licensee must have procedures in place to ensure these tickets are adequately disposed of to ensure these tickets are not included in the calculation of AGP. If a valid ticket is issued after one of these events, then the ticket is processed as normal. Interview accounting personnel to determine their understanding of this requirement.

C	N	2C	2N
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### Found Tickets

1. Found tickets or coupons are not deductible for gaming tax purposes until claimed by a patron and redeemed. Accounting must ensure that found tickets are not deducted for gaming tax purposes until these criteria are met. Found tickets remain a liability for the casino until they expire after 120 days from issuance or claimed by the patron. Found tickets or coupons cannot be used to perform machine testing. Ensure found tickets are not deducted for gaming tax purposes.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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### Ticket or Coupon Overrides

1. Overrides are defined as changes to system information made at the time of the event. Licensee must have procedures in place to prohibit any changes to system information for tickets or coupons. The status of a ticket or coupon that has been redeemed, expired or voided must not be changed. If a ticket or coupon cannot be properly processed, a supervisor must provide authorization to allow for the completion of the transaction. Accounting must review all override reports to ensure no unauthorized overrides for tickets or coupons have occurred. Ensure accounting reviews all override reports to ensure no unauthorized overrides for tickets or coupons have occurred.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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### Adjustments

1. Adjustments are defined as changes to system information made subsequent to the time of the event. Any corrections and/or adjustments made to ticket or coupon information must be supported by adequate documentation. In the case where reports are reprinted to reflect any corrections and/or adjustments made by accounting personnel (e.g., "final run" reports), corrected and/or adjusted information reflected on these "final run" reports must be reviewed by someone other than the individual who made the correction/adjustment. This reviewer's initials and date of the review must evidence this review. Ensure any ticket adjustments are adequately supported as required.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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### Test Tickets

1. Test tickets are issued when the slot department performs machine testing for variance investigations, new machine testing, new EBT devices and possible machine malfunctions. It is appropriate for test tickets to be redeemed. Test tickets may be included in "Tickets Redeemed" reported on the gaming tax return. Accounting must ensure accurate reporting for test tickets. Found tickets or coupons cannot be used to perform machine testing. Ensure compliance with these requirements.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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### Expired Tickets and Coupons

1. Unredeemed tickets expire 120 days after issuance. Expired tickets are no longer valid for gaming tax purposes. If the licensee chooses to honor an expired ticket, the payment shall be considered promotional and is not deductible for gaming tax purposes. Evidence of payment of an expired ticket must be visible on the upper right hand corner of the expired

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**2N** = Noncompliance at Follow-up

ticket. An example of this is writing "Paid Expired" or "PD Exp", etc. Coupons must have an expiration date. Coupon payments are not deductible for gaming tax purposes. Purchase tickets must have an expiration date, and are not deductible for gaming tax purposes. Ensure compliance with this requirement.

**Removal of TITO Devices**

1. Licensees are responsible for ensuring that all unredeemed tickets from a TITO device that have been removed/disabled are accurately tracked for patron redemption, proper reporting and liability purposes until expiration. Ensure accounting has procedures in place to track unredeemed tickets.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**Record Retention**

1. All tickets must be retained until the Division has issued written approval to rely upon the ticketing module. After receiving written approval, tickets in the possession of the licensee must be retained for at least 60 days from date of redemption, expiration or void. Coupons cannot be used in the casino until permanent approval of the TITO module, by the Division, has been granted. Tickets and coupons must be destroyed in a manner that precludes them from being used inappropriately. Tickets and coupons containing signatures or other evidence of internal control procedures must have all of the information contained on the ticket or coupon documented on a separate report or log in order to destroy the ticket after the 60-day retention period. Ensure this requirement is met.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**ICMP – TICKET IN/TICKET OUT, PURCHASE TICKETS AND SLOT COUPONS - F. ISSUANCE OF PURCHASE TICKETS AND COUPONS**

**Purchase Tickets**

1. Paper stock used for the generation of purchase tickets shall be stored in a secure location to prevent unauthorized access, tampering, or theft.
2. All purchase tickets must be generated using the casino's approved gaming system. The licensee must follow the procedures outlined in the manufacturer's specifications to ensure all purchase tickets are cashable.
3. Purchase tickets can be issued from the cashier cage and a ticket issuance/redemption kiosk.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**Coupons**

1. Paper stock used for the generation of coupons shall be stored in a secure location to prevent unauthorized access, tampering or theft. Ensure paper stock for coupons is stored in a secure location.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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2. All coupons must be generated using the casino's approved gaming system. The licensee must follow the procedures outlined in the manufacturer's specifications to ensure all coupons are cashable. The casino or outside vendors will be permitted to print or distribute coupons. Ensure compliance with this requirement.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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3. The licensee may have the ability to offer separate coupon programs for different events. Several coupon programs can be offered concurrently; however, each program must be separate and distinct from any other program. Review the coupon programs to ensure compliance.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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4. Coupons must be printed in a secure location, but may not be printed in the cage. Only licensed supervisors (e.g., marketing manager, gaming managers, etc.) are authorized to generate the various programs and approve the printing of the gaming coupons. Document where coupons are printed and who prints the coupons.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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5. Licensed employees granted access to produce slot coupons, cannot be granted access to redeem them. Ensure employees that produce coupons cannot redeem them.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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6. When using an outside vendor to print and distribute coupons, the vendor must:
- Provide the licensee proof of security of stock paper storage location, printing location, and data file workflow.
  - Not be allowed any access or privileges whatsoever to the licensee's slot monitoring system.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Other:

- Processing the data for a coupon event may be completed with an external application and imported into the slot monitoring system for printing.
- Transfer of data to/from the vendor can be transmitted through File Transfer Protocol (FTP) or put on another type of compatible media.
- Access to the FTP site is limited to the licensee's supervisors authorized to generate coupons and the vendor's personnel.
- FTP site passwords must be changed monthly.
- Final printed data file must be removed from the FTP site as soon as it is retrieved by the authorized vendor. Any data media file must be returned to the licensee.
- All coupons must be printed to paper or to a final data file.
- Final data file must be printed to a secure network location. Only individuals authorized to generate coupon events will have access, and no access may be granted to individuals who have rights to redeem coupons.

Interview casino personnel to ensure compliance with the above.

The following procedures apply whether the licensee is printing or having coupons printed:

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7. All coupon series shall be issued in sequential order having a unique validation number. Review a series of coupons to check the validation numbers.

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8. Upon printing the coupons, the system must produce a report that, at a minimum, lists the name and description of the program, validation numbers, number of coupons printed, date and time coupons were printed, name of individual that printed the coupons, station or location that printed the coupons, the dollar amount of each coupon, and total dollar amount of all coupons. This report may be maintained electronically in the same manner as other supporting reports. Review the system report to ensure the above elements are included in the report.

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9. The licensee must have procedures in place and is ultimately responsible for ensuring correct amounts are printed, serial numbers are in sequence, and no duplicate coupons were printed or issued. The licensee must prepare and maintain in its gaming system, for the time period during which the coupon is valid, a listing of all patrons to which a coupon(s) was mailed. The list shall include, at minimum, the following information: The patron name, the patron address and the coupon(s) amount(s). Ensure compliance with this requirement.

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**ICMP – TICKET IN/TICKET OUT, PURCHASE TICKETS AND SLOT COUPONS - G. TICKET ISSUANCE/REDEMPTION KIOSKS**

**General**

1. Audit procedures of system data in relation to the use of the kiosk, including the reconciliation process, must be documented by the Accounting Department (typically in the required written accounting plan). The reconciliation process must include reviewing kiosk overages and shortages, dispensing errors and the status of printed kiosk receipts. Uncashed kiosk receipts cannot be included in the tickets redeemed deduction for calculation of taxable AGP. Ensure the appropriate written procedures are maintained.

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2. A kiosk access log must be maintained inside each kiosk. Each person who accesses the kiosk for any defined event shall make an entry on the log. A defined event includes but is not limited to, the following: Service and repairs, clearing stacker (accepts currency, ticket and coupons) and cassette (dispenses currency) jams, tilt resets, hopper (dispenses coin) an cassette fills, drops (removal of stacker to be counted), troubleshooting error conditions and kiosk test activity. Kiosk(s) are under surveillance coverage. Ensure these requirements are met.

C	N	2C	2N
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3. Any overage or shortages of \$1,000 or more that occurs on a kiosk that is not resolved within seven days are accumulated for the month and are reported in writing to the Division's Audit Section by the 15th of the following month. Include a list of the overages/shortages along with the circumstances and results of the investigation for each case. If an overage or shortage involves theft or any indication of unlawful activity, it must

C	N	2C	2N
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be reported to the Division immediately. Review kiosk overages/shortages to ensure the requirements are met.

4. All system related problems are documented on the RAMP log. Ensure the log has been completed correctly.

C	N	2C	2N
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5. If the kiosk is housed in the same cabinet as an ATM, the two functionalities must be segregated. These cabinets are considered gaming equipment and as such any person accessing the cabinet for any reason must possess a gaming license. Reports from both the kiosk and the ATM are used by accounting to perform the reconciliation. Interview accounting personnel regarding these requirements.

C	N	2C	2N
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**Key Control**

1. A kiosk must have the following restricted keys:
  - a. Kiosk door key is maintained in the Gaming Manager locked box 2. In the event two locks are utilized, the second key to access the kiosk is maintained by Security in locked box 1. Ensure the kiosk door key(s) are maintained in the correct key boxes for a manual key system, or have appropriate access controls in an automated key tracking system.

C	N	2C	2N
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2. Stacker release key is maintained in the Security locked box 1.

C	N	2C	2N
---	---	----	----

3. Stacker content key is maintained in the Gaming Manager locked box 2.

C	N	2C	2N
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4. Stacker rack key is maintained in the Security locked box 1.

C	N	2C	2N
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5. If only one key is required to access the kiosk; a separate and different key is required to access the cassettes. The kiosk cassette release key is maintained in Security Locked box 1.

C	N	2C	2N
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**H. ICMP – TICKET IN/TICKET OUT, PURCHASE TICKETS AND SLOT COUPONS - WIRELESS HANDHELD VALIDATION DEVICE**

1. Validation devices may only be used at the casino where they were obtained and on the casino gaming floor where gaming activity is performed. All validation device transactions must be under surveillance coverage.

C	N	2C	2N
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2. Audit procedures of system data in relation to the use of the validation device, including the reconciliation process, must be documented by the Accounting Department (typically in the required written accounting plan).

C	N	2C	2N
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3. Any documentation that results from the use of the validation device must be maintained by the licensee and is subject to the document retention requirements mandated in CLGR 30-

C	N	2C	2N
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1607. These documents must be made available to the Division upon request. All tickets or slot coupons must be retained for at least 90 days from date of redemption, expiration or void date.

**Physical Access Controls**

1. Physical access to validation devices is limited to authorized individuals only. Validation devices must be maintained in a secure location within the casino. The key to the device storage cabinet must be maintained in Locked Box 1 and may be checked out for the entire shift. The individual accessing the cabinet must be independent of the related validation device transactions. The individual accessing the cabinet and the individual checking out the device must both be present when the cabinet is accessed.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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2. The issuance of validation devices on the gaming floor is controlled through a wireless device control log secured with the validation devices. This log must be completed whenever a validation device is checked in or out. The licensed individual that will be using the validation device must complete the log. The log must include, but is not limited to, casino name, gaming license number, date and time of check out, signature and license number of individual assigned the device, position of individual, validation device identifier (a number or name associated with that specific validation device), nature of access (gaming transactions, maintenance functions, test activity, returned to manufacturer, etc.), date and time of check in, and the signature and license number of the employee returning the device. Ensure this requirement is met.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

3. Another licensed employee must initial and provide their license number on the log attesting to the access and accuracy of the log each time a device is checked out or in. The log must be forwarded to accounting no later than the first day of the month for the prior month.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

4. Validation devices must remain on property unless they are being returned to the manufacturer or authorized repair center. Individuals authorized by the system access listing and key control logs may allow the removal of wireless devices needing off site service or repair. Additionally, validation devices removed from the licensed gaming property for repair, upgrades or other reason must be disabled while off premises.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**Validation and Redemption Procedures**

1. Only one associated user shall use a specific validation device during a session; another user may not use the same validation device during the established session. The authorized user must log onto the validation device for a discrete session or work shift, and validate tickets or slot coupons for the duration of the session.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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2. In the event that the validation device user goes on break, the casino must have written procedures in place to secure the bank and validation device to prohibit another individual from using the bank or device. The intent is to allow for breaks without closing the session

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

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when the system only allows one session or one log in per person per day. Ensure this requirement is met.

3. To redeem a ticket or slot coupon, the floor person must review the ticket or slot coupon to ensure it is valid. The ticket or slot coupon bar code must be scanned or the validation number entered into the validation device. The floor person must verify the amount on the ticket or slot coupon agrees to the amount indicated on the validation unit and validates the ticket or slot coupon in the system. If the ticket or slot coupon is valid for redemption, the floor person pays the patron the appropriate amount and retains the redeemed ticket or slot coupon to represent the cash paid from the bank. In the event the ticket or slot coupon is not redeemable or the amount on the face of the ticket or slot coupon is different from the amount returned by the validation device, the ticket or slot coupon must be retained for further investigation by the gaming manager at the cashier's cage. Ensure this requirement is met.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

4. If communication is lost between the system and the validation device, the floor person must return the ticket or slot coupon to the patron. No tickets or slot coupons may be redeemed by the floor person when communication is lost. In lieu of returning the ticket or slot coupon to the patron, the floor person may redeem the ticket or slot coupon at the cage for the patron. In this case follow procedures in the TITO section. Ensure this requirement is met.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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5. Requests for payment of lost, stolen, expired or mutilated tickets or slot coupons may not be processed by the floor person with the validation device. Mutilated tickets or slot coupons, in this context, are tickets or slot coupons where the entire validation number is not visible. The floor person must contact a person of supervisory authority or direct the patron to the cashier's cage to resolve the situation. Ensure this requirement is met.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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6. Tickets and slot coupons validated using a validation device may be paid by following pouch procedures. Please refer to the Slots section for pouch pay procedures. Ensure this pouch pay procedures are followed.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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7. The written accounting plan must include the reconciliation of all tickets redeemed through the use of a handheld device, and the inclusion of these tickets on the applicable supporting and statistical reports. Ensure the written accounting plan contains appropriate procedures.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**Additional Comments:**

**ICMP Compliance Checklist: Section 8, TICKET IN/TICKET OUT, PURCHASE TICKETS AND SLOT COUPONS**  
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**Review Recap**

*Initial Review      Follow-up*

(1) Total items tested      \_\_\_\_\_      \_\_\_\_\_

(2) Total noncompliance items      \_\_\_\_\_      \_\_\_\_\_

**ICMP Compliance Checklist: Section 9, CASHIER**  
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Licensee Name	<b>Review Recap</b>		
Prepared By			
Period Reviewed (ICO Use Only)		Initial Review	Follow-up
Date & Time Completed	(1) Total items tested		
Date Follow-up Performed	(2) Total noncompliance items		

**DIVISION OF GAMING USE ONLY**

Employee Signature & License #

Casino Manager Signature & License #

**ICMP – CASHIER - A. GENERAL**

**CAGE REQUIREMENTS**

1. Each cashier in the cashier cage is responsible for ensuring that any transactions involving gaming assets or paperwork received or distributed through the cage windows are displayed in the transaction square in such a manner so the transaction can be easily verified by means of surveillance review. Observe transactions to ensure this procedure is met.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

2. The cashier is custodian of the restricted keys. The keys are maintained in locked key boxes and must have accompanying key access logs. The cashier must review the manual key logs prior to the end of each shift to ensure the accountability of restricted keys. This is achieved by the cashier ensuring the proper return of restricted keys. The gaming manager must be notified of any keys that have not been properly returned. If the licensee utilizes an automatic key tracking system (AKTS), the system is the custodian of the restricted keys (refer to the Key Control section, AKTS, of the ICMP. Interview the cage personnel to ensure his/her understanding of this procedure. Review manual key control logs for restricted keys to determine if all keys were returned timely. If keys were not returned timely, determine if the appropriate action was taken.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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3. Persons inside the cashier cage are not allowed to have any personal currency on his/her person. Extraneous items such as magazines, books, purses, personal currency, boxes, hats, promotional merchandise, etc., are not allowed in the cage. A reasonable amount of supplies necessary for printing and issuing player cards (e.g. blank player card stock, embossers, ink ribbons, etc.) and a reasonable amount of promotional supplies (e.g. prize vouchers, scratch tickets) will be permitted in the cage. At no time may these supplies be commingled with cashier funds or block surveillance coverage. Sweaters or coats are allowed only if they do not obstruct the view of any surveillance cameras or interfere with the cage operations. These items, if not worn, must be placed away from the cage drawers so that an overt action by the cashier is necessary to retrieve the item.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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4. If cashiers have beverage containers or trash cans in the cashier cage, management must ensure that appropriate written policies and controls are in place to prevent any theft of monies utilizing any such containers. Cashiers must be aware of the written policy.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Verify there is a written policy. Interview the cage personnel to determine their understanding of the policy.

5. The cashier cage must remain locked at all times. The owner/operator, or his/her designee, and cashier personnel maintain the key(s) to the cashier cage. Verify the door is locked and who has access to the keys.

C	N	2C	2N
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6. Procedures must be in place to prevent the recycling of both promotional and gaming coupons. When promotional coupons are redeemed by patrons and accepted into the cashier cage, they must be voided in such a manner as to eliminate recycling of the coupons. When gaming coupons are presented at the casino's cage, kiosk, or similar validation point, these coupons must be validated and redeemed through the system. Interview cage personnel and observe transaction to determine compliance with this procedure.

C	N	2C	2N
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7. A cashier must be on duty and on premises at all times when the casino is open for gaming business. Verify a cashier is on duty and on premises at all times.

C	N	2C	2N
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**EQUIPMENT**

1. The Division recommends that all coin and currency counting devices (e.g., jet sorts, coin wrappers, currency counters, etc.) be tested at the beginning of the shift. This procedure will help detect problems with counting devices, which may be overpaying or underpaying patrons. Verify if equipment testing is being completed at the beginning of the shift.

C	N	2C	2N
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2. The licensee must ensure dissimilar coins are not commingled in fill bags. For coin counting machines that have an overflow mechanism to capture odd denominations, this overflow amount must be included in the cage inventory. The overflow mechanism can contain dissimilar coins. Some coin counting machines do not have an overflow mechanism to capture odd coin denominations, such as pennies and dimes. In this case, the odd denominations may be commingled with other denominations (e.g., the nickel bag); however, if this occurs, the licensee must have procedures to correct this situation. For example, the bags can be run through another counter to separate the dissimilar coins. Interview the cage personnel to verify their understanding of this procedure.

C	N	2C	2N
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**COINAGE**

1. The wrapping of loose coin is performed at a time and location that does not interfere with the slot machine count and wrap process or the accountability of that process. If a variance is noted when bagged coins are wrapped, a count (weigh)/wrap variance report must be completed. The cashier notes the variance, date, and circumstance (e.g. wrapping of two 5-cent bags) on the report. For all variances, the cashier and the gaming manager, or gaming manager designee, must sign the count (weigh)/wrap variance report attesting to the variance. Interview cage personnel and verify their understanding of this procedure.

C	N	2C	2N
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2. Bagged coin coming off a jet sort machine must be immediately sealed or wrapped. If the bags are not color coded or the denomination cannot be determined visually (i.e., clear bags), the bag must be tagged with the denomination. Also, any bagged coin that does not contain a

C	N	2C	2N
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standard fill amount, as defined by the licensee, 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. If the licensee closes, bagged coin attached to the jet sort machine at the end of the gaming day must be secured to preclude access to the contents of the bags. Judgmentally select three (3) to five (5) fill bags and/or other bagged coin from the cage to verify.

	Variance				
Denom	Bag 1	Bag 2	Bag 3	Bag 4	Bag 5
\$0.01					
\$0.05					
\$0.10					
\$0.25					
\$0.50					
\$1.00					

**FORMS**

- All gaming forms must be completed in ink. Errors on gaming documents must be lined through and the correction written above. **Under no circumstances will an entry be written over or modified in any other manner.** Review cage paperwork to determine if errors are corrected in accordance with this procedure.

C	N	2C	2N
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**TIPS**

- Tips received by a cashier are deposited into a container clearly marked "tips" or distinguishable as a depository for tips. Tips received by a cashier are not combined with the licensee's monies. Dealer tips receipted into the cage may impact cage accountability depending upon how they are distributed, and therefore must be reflected accordingly on the daily cash summary. Interview cage personnel to determine how tips are handled.

C	N	2C	2N
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**BREAKS**

- The gaming manager may provide coverage of the cashier cage in order to allow the cashier to leave the cage for breaks. When in this capacity the gaming manager may not initiate a transaction on the floor or authorize an override transaction. While acting as a cashier, the gaming manager is limited to processing gaming transactions. The gaming manager may not have access to the cashier keys to box 1 (Security locked box 1) or box 2 (Gaming Manager locked box 2). Interview the gaming manager to determine his/her understanding of this procedure. Observe the gaming manager when breaking the cashier to determine compliance with this procedure.

C	N	2C	2N
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**AUTOMATED CAGE SYSTEMS**

- Licensees are required to notify the Division, in writing, upon intent to use an on-line or off-line cage system. An on-line cage system is an integrated module of a gaming system. An off-line cage system is independent of, and does not directly interface with, the gaming

C	N	2C	2N
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system. Verify the licensee has properly notified the Division if there is an on-line or off-line cage system being used.

- For licensees using a cage automated system, if any slips need to be voided in the system, a cage supervisor or gaming manager is required to authorize the void in the system. If the system does not print or generate a "void" slip, the slip is voided using the void procedures detailed in the General section of the ICMP's. Interview cage personnel to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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- The licensee must ensure access to the cage system is authorized to appropriate individuals at appropriate levels and in accordance with the system access requirements listed in the Gaming Systems section of the ICMP's. Review which employees have access, their level of access, and determine the appropriateness of their access.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**JACKPOT PAYOUT AND FILL PROCEDURES**

***Jackpot/Fills processed and paid by cashier***

- The jackpot/fill slips are processed at the cashier cage. This can occur using a manual process, gaming system or a cage system. The Gambling Payment Intercept registry must be verified before a payment is made to the patron. The cashier processes the slip at the cage and provides the slip and funds to the licensed employee for payment. Ensure that the Gambling Payment Intercept registry is verified before payment is made to the patron.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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- If a gaming system is utilized for processing jackpots and fills, the jackpot/fill information is sent directly to the cashier cage. The jackpot/fill slip is printed at the cashier cage. The cashier reviews the slip for accuracy and continues to process the slip. Observe jackpot/fill transactions to ensure the cashier reviews the slip for accuracy.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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- If an automated cage system is utilized for processing jackpots and fills, the jackpot/fill information can be entered into the system by the cashier or licensed employee at the cashier cage. The jackpot/fill slip is automatically printed at the cashier cage; the cashier reviews the slip for accuracy and continues to process the slip. Observe jackpot/fill transactions to ensure the cashier reviews the slip for accuracy.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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***Jackpot/Fills processed at a workstation and paid by cashier***

- Licensees with a gaming system may process jackpot/fill slips at a secure jackpot/fill workstation on the casino floor. The jackpot/fill slip is printed at the cashier cage or at the workstation. The licensed employee preparing the slip reviews the slip for accuracy and takes the slip to the cashier cage. The cashier reviews the slip for accuracy and continues processing the slip. A workstation must be secured through the use of appropriate system access permissions. Observe jackpot/fill transactions to verify the licensed employee and cashier review the slip for accuracy.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Interview personnel to determine the workstation is secured. Observe transactions to verify employees use their password to access the workstation.

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***Jackpot/Fills processed at a workstation and paid via a pouch pay***

1. The jackpot/fill slips are processed outside the cashier cage. Licensees with a gaming system can process jackpot/fill slips at a secure jackpot/fill workstation on the casino floor and pay the jackpot via a pouch pay. Only jackpots less than \$1,200 may be paid via a pouch pay. Jackpots of \$1,200 or more, jackpots which require an override, or additional payouts, must be paid from the cashier cage. A workstation must be secured through the use of appropriate system access permissions. Interview the personnel processing jackpot/fill slips to determine his/her understanding of this procedure. Interview personnel to determine the workstation is secured. Observe transactions to verify employees use their password to access the workstation and ensure only allowable transactions are processed via a pouch pay.

C	N	2C	2N
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***Processing jackpot/fills when the system is down***

1. If the gaming system or automated cage system goes down, the licensee reverts to the manual process for processing jackpots and fills, which means all jackpots and fills are processed through the cage using the three part jackpot/fill slips. Interview the personnel involved in the processing of jackpots and fills to determine their understanding of this requirement.

C	N	2C	2N
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**ICMP – CASHIER - B. KEY AUTHORIZATION LOGS OR SIGNATURE CARDS**

1. A separate key authorization log must be maintained for each restricted key located in either box 1 or box 2. Any employee authorized to check any restricted key(s) out of or into box 1 or box 2 must be listed on the key authorization log. If an employee requests a restricted key and he/she does not have the proper authority according to the key authorization log, the cashier must deny access. Each key authorization log must include the following information: key number and description, employee name (printed), employee gaming license number, employee department (e.g., pit, slots, etc.), employee position/job title (e.g., slot technician, pit supervisor, etc.), employee's signature, an owner's or owner designee's signature authorizing the employee's authority, and the date the employee's authority became effective and/or was removed. Verify the key authorization logs contain all the required information and there is a log for each restricted key box.
2. Any time there is a change (e.g., the employee changes job duties, name change, termination, etc.,) the key authorization log(s) must be immediately updated to reflect the change. A copy of the key authorization logs is sent to the accounting office for its use in verifying proper signatory authority. Review the key logs for a sample of employees to ensure the log is updated and current.
3. Alternatively, licensees may choose to use signature cards authorizing an employee's authority to access restricted keys. If this method is chosen, each gaming employee must have a signature card on file.

C	N	2C	2N
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C	N	2C	2N
---	---	----	----

C	N	2C	2N
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The original signature card must be kept in the cashier cage and used by the cashier to verify the employee's key signature authority. A copy goes to the accounting office for accounting's use in verifying proper signatory authority. Signature cards must include the following information: employee name (printed), employee gaming license number, a list of all restricted keys the employee can access, employee department (e.g., pit, slots, etc.), employee position/job title (e.g., slot technician, pit supervisor, etc.), employee's signature and initials, an owner's or owner designee's signature authorizing the employee's authority, and the date the employee's authority became effective. Verify the signature cards contain all the required information and the signature cards are located in the cashier cage with copies in the accounting office.

4. Any time there is a change (e.g., the employee changes job duties, employee name change, etc.) the signature card must be immediately updated to reflect the change or a new signature card must be completed. When an employee is terminated, the signature card must be immediately removed from the cage and forwarded to accounting. Review the signature cards for a sample of employees to ensure the cards are updated and current.
5. The licensee is responsible for ensuring that licensed employees only sign gaming forms commensurate with his/her job duties. Review gaming documents to ensure employees are signing the forms that are only commensurate to his/her job duties.

C	N	2C	2N
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C	N	2C	2N
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**ICMP – CASHIER – C. TRANSERS TO/FROM VAULT**

1. If the licensee has a separate coin room, a vault may not be necessary. The vault is a secure area where duplicate keys and reserve supplies of monies, chips, and tokens are stored. In view of the fact that these items are not used in the normal daily routine, access to the vault must be dual controlled (i.e., two individuals, each with a unique key or lock combination). It takes both the owner/operator and the gaming manager to access the vault. Both persons are required to be present when the vault is accessed. No one else is allowed access to the vault area. If the owner/operator is not available, then he/she may assign access ability to a designee (e.g., cashier). If access to the vault is dual keyed, the two keys to the vault may be kept in the two keyed locked boxes, with one key in box 1 and the second key in box 2. If access to the vault includes a combination lock, the combination to the lock must be changed on a regular basis (at a minimum every 6 months) and immediately when there is a change in or termination of personnel who have knowledge of the combination. If the combination lock is not used to satisfy the dual lock requirement for the vault, the combination does not need to be changed. Verify the location of the keys to the vault and who has access to the vault keys. If a combination is used, determine when the combination was last changed.
2. The following procedures are performed for vault transfers: the owner/operator or gaming manager decides when a transfer of funds shall be made to/from the vault; a vault transfer sheet is prepared showing the amount of monies to be transferred to/from the vault and is signed by the owner/operator or gaming manager.

C	N	2C	2N
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C	N	2C	2N
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If the amount is from a specific process (e.g., table games, kiosk, slot count) this must be noted on the memo portion of the vault transfer sheet. The transfer of monies takes place. The cashier verifies the amount of the transfer and signs the vault transfer sheet attesting to the transaction; the gaming manager immediately forwards the original (white) to accounting. The cashier keeps the first copy (yellow) with the paperwork for that shift. The second copy (pink) must be given to the owner/operator or gaming manager who places it in the vault as documentation of the transfer and it is later used when the licensee reconciles the inventory of the vault. The cashier makes the appropriate entry to the daily cash summary report and vault reconciliation. Review vault transfer sheets to verify proper completion. Interview personnel involved with vault transfers to determine their understanding of this procedure.

- The vault must be inventoried and a documented reconciliation performed at least once a day by two people independently verifying the inventory. The reconciliation must be performed by taking the beginning inventory, adding vault transfers in and subtracting vault transfers out, to arrive at the ending vault inventory. This figure must agree to the inventory amount physically counted. At the completion of the reconciliation, all paperwork, including the pink copies of the vault transfer sheet and vault inventory sheet are forwarded to accounting. Interview personnel involved with the vault inventory and reconciliation to determine his/her understanding of this procedure. Observe an inventory and reconciliation.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**ICMP – CASHIER – D. COIN ROOM**

- Additional monies, chips, and tokens are stored in the coin room. Unlike the vault, these monies, chips, and tokens shall be used by the cashier in the daily course of business and must be accounted for by the cashier. The coin room must be secured at all times. The cashier maintains the key to the coin room. The cashier may enter the coin room to obtain additional monies, chips, and tokens when necessary to perform normal daily functions (e.g., hopper fills, table fills, etc.). Verify the coin room is secured and who has access to the key to the coin room.
- The coin room inventory is independently counted by two cashiers at the beginning and at the end of each shift. All contents of the coin room shall be recorded on the cash inventory sheet. Both cashiers must sign the cash inventory sheet indicating the accuracy of the paperwork after verifying the total inventory. If a second cashier is not available, the gaming manager or gaming manager designee may perform this function. Observe an inventory count to ensure compliance with this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**ICMP – CASHIER – E. STORED CHIPS AND TOKENS**

- Unused and excess tokens/chips may be stored in a secure location, which is a dual locked area, or secured in such a way that access to the chips and tokens would be evident. The storage location must be under surveillance. Since these stored chips and tokens 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.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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A separate documented inventory is completed by the two licensed individuals accessing these chips and tokens. If these chips and tokens are secured at all times and not accessed, the last known inventory count can be used for the quarterly chip and token reconciliation and used in conjunction with the minimum bankroll calculation described in the Accounting section of the ICMP's. Chip and token inventory documentation is immediately delivered to accounting or dropped in the locked accounting box. Additionally, a log is maintained with the chips and tokens and the log must be completed each time they are accessed. The date individuals accessed the chips and tokens and the reason for accessing them are recorded on the log. If the unused and excess chips and tokens are stored in a dual locked area, one key is maintained in box 1 and one key is maintained in box 2. An AKTS may be utilized to maintain these keys. Interview personnel involved with the stored chips and tokens to determine his/her understanding with this procedure. Review the inventory documentation to verify all required information is included.

**ICMP - CASHIER – F. NON-GAMING TRANSACTIONS**

1. The cashier may accept monies and distribute funds as appropriate for other non-gaming operations of the licensee. Revenues accepted shall be noted by type on the daily cash summary (e.g., bar revenue, restaurant revenue, etc.). All items receipted into the cashier cage must have proper supporting documentation to support the receipt (i.e., a receipt voucher). Interview the cage personnel to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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2. All expenses are noted by detailing the individual disbursement on the daily cash summary. All items paid out of the cashier cage must have documentation to support the disbursement (i.e., a disbursement voucher). Interview the cage personnel to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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3. No loans or payroll advances to employees or any other person can be made from the cashier cage. Interview the cage personnel to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**ICMP - CASHIER – G. INVENTORY COUNT**

1. If the casino is open for more than 12 hours during a gaming day, at least two shifts must be conducted. All required gaming documentation must be maintained for each shift. The following are the steps cashiers must follow for the cage inventory:

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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- a. At the beginning of the first shift, the on-coming cashier counts down the cash, coin, token and chip inventory, as well as all imprest banks or drawers. The inventory must be documented on the cash inventory sheet indicating that it is the "open" count for the first shift. Imprest banks must be documented on either the cash inventory sheet or an imprest bank inventory form and attached to the cash inventory sheet.
- b. A second cashier independently counts the cash, coin, token and chip inventory, as well as all imprest banks or drawers. After verifying the amount with the on-coming cashier, both cashiers sign the cash inventory sheet. If a second cashier is

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not available, the gaming manager or gaming manager designee may perform this function.

- c. At the beginning of the second shift, the off-going cashier counts down the cash, coin, token and chip inventory, as well as all imprest bank or drawers. The inventory count must be documented on the cash inventory sheet indicating that it is the "close" count for the first shift.
- d. The on-coming cashier independently counts the cash, coin, token and chip inventory, as well as all imprest banks or drawers. This inventory count must be documented on a separate cash inventory sheet indicating that it is "open" count for the second shift.
- e. Once the two cashiers independently verify each other's inventory count and the amounts agree, both cashiers sign each cash inventory sheet.
- f. At the end of the second shift, the off-going cashier counts down the cash, coin, token and chip inventory, as well as all imprest banks or drawers. The inventory must be documented on the cash inventory sheet indicating that it is the "close" count for the second shift.
- g. A second cashier independently counts the cash, coin, token and chip inventory, as well as all imprest banks or drawers. After verifying the amount with the off-going cashier, both cashiers sign the cash inventory sheet. If a second cashier is not available, the gaming manager or gaming manager designee may perform this function.

If there is a third shift, the procedures documented in the steps above are completed for the third shift of the gaming day. Observe an inventory as well as review the inventory count sheet to determine compliance with this procedure.

2. All bundled currency (straps and bricks) must be recounted (piece count) at least weekly. When the bundled currency is recounted, the cashier initials and dates the straps indicating the piece count was completed. Select a sample of bundled currency and verify the currency has been recounted within seven days.

C	N	2C	2N
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**ICMP - CASHIER – H. IMPREST BANKS**

***Imprest banks that are part of cage accountability***

1. Imprest banks that are part of the cage accountability include all imprest banks in the cage and can include imprest banks on the floor.

C	N	2C	2N
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These banks must be reflected on a cash inventory sheet under miscellaneous banks and independently verified twice each shift (open & close) by two cashiers or one cashier and the gaming manager during the gaming day. Transactions for this bank include slot machine

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transactions such as jackpot payouts, hopper fills, ticket redemptions, purchase ticket redemptions, gaming coupon redemptions, table games transactions (fills, credits, jackpots, ticket redemptions, purchase ticket redemptions) keno transactions (accepting wagers and paying our winning tickets), and making change for customers. Imprest banks maintained in the cashier cage must be inventoried prior to the imprest bank being used. An imprest bank, which is not operational for that gaming day must be independently inventoried at least once during the gaming day. If an overage or shortage is noted, an investigation is conducted into the discrepancy. The results of the investigation must be documented. Interview the cage personnel to determine their understanding of this procedure.

***Imprest banks that are not part of cage accountability***

1. Imprest banks that are not part of the cage accountability are only used to make change for customers and not used for any other transactions such as jackpot payouts, hopper fills, ticket redemption, slot coupon redemptions, or table games transactions. A documented inventory for imprest change banks is optional. The licensee must have a written policy to safeguard the imprest funds if a documented inventory is not performed. Interview the cage personnel to determine their understanding of this procedure. Verify there is a written policy, if applicable.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**ICMP - CASHIER – I. CHANGE PERSON PROCEDURES**

**ISSUING A CHANGE BANK**

For imprest change banks used on the gaming floor that are part of the cage accountability, the following procedures apply:

1. Each change person maintains an imprest change bank. Each change bank must be securely kept in the cashier cage until it is checked out to a change person. When the change person checks out the bank from the cashier cage, the cashier counts the change bank and completes the imprest bank inventory form. The cashier gives the change person the bank and the imprest bank inventory form. The change person recounts the bank. If there are no discrepancies, both the cashier and change person sign the imprest bank inventory form. The cashier maintains the inventory form. Observe a change bank check out to verify compliance with this procedure.
2. When the bank is checked back in, the change person completes a new imprest bank inventory form. The cashier verifies the amounts and if there are no discrepancies, both the cashier and change person sign the form. The inventory form must be maintained by the cashier and forwarded to accounting with the cage paperwork for that shift. Observe a change bank check in to verify compliance with this procedure.
3. If an overage or shortage occurs, the change person involved is required to fill out an overage or shortage slip and the supervisor investigates these overages/shortages. If an overage occurs, the excess amount from the change person's bank is given to the cage cashier who records the overage on the daily count summary. If a shortage occurs, a shortage slip must be prepared and given to the cage cashier. The cage cashier issues the amount necessary, as

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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noted per the shortage slip, to replenish the change bank. The cage cashier records the shortage on the daily cash summary. If discrepancies occur when change banks are checked in or out, both the cashier and the change person must recount the contents until discrepancies are resolved. Interview cage personnel to determine their understanding of this procedure.

**REPLENISHING AN IMPREST BANK**

When the imprest bank needs to be replenished with chips, tokens, bills, and/or coins (funds), an exchange for funds is made using a change bank exchange form.

1. The change person completes the change bank exchange form, a one part form maintained in the change bank, which includes the following information: licensee name, date, time, bank number, amount of funds turned into cage by denomination, and amount of funds requested in exchange, by denomination turned into the cage. The change person signs the change bank exchange form indicating proper completion of the form and removal of the funds from the bank. The change person gives the funds and form to the runner. If the imprest bank is mobile or if the bank can be locked and secured while the change person is absent, the change person may perform these procedures at the cage and no runner is needed. The runner verifies the funds in the presence of the change person. If the change person performs an even money exchange with the cashier and a runner is not involved, it is not necessary to complete a change bank exchange form. If a change of accountability occurs (i.e., use of a runner), when exchanging funds, a change bank exchange form must be completed. The runner takes the funds and change bank exchange form to the cashier cage to purchase the appropriate amount of funds. Upon receipt of the funds and the change bank exchange form, the cashier verifies the funds agree to the change bank exchange form. The cashier exchanges the funds for the amount of funds as requested on the change bank form and signs the form indicating receipt of and disbursement of the funds as indicated on the form. The runner verifies the funds and compares them to the change bank exchange form to ensure they agree and signs the form in the presence of the other cashier indicating the amount agrees to the funds requested and receipt of the funds. The cashier gives the funds and the change bank exchange form to the runner. The runner transports the funds and the exchange bank form to the change person. The change person verifies the amount of funds received is the amount requested in the presence of the runner. Upon verification, the change person initials next to the total amount received on the change bank exchange form indicating receipt of funds. The change person then places the funds in the change bank and immediately places the change bank exchange form in the locked accounting box. It is acceptable to have the runner place the change bank exchange form in the locked accounting box on the change person's behalf. Observe an even exchange to determine compliance with this procedure and the form contains the required information.
2. Even money exchanges between the change banks and the cashier cage must be monitored by surveillance. The monitoring must be of such quality that the transaction cameras are able to differentiate between bill denominations and between chip, token, and coin denominations. The amount of chips must be identifiable by the color and/or design of the chips. Review surveillance tapes to ensure the quality is obtained.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**ICMP – CASHIER - L. RECORDING TRANSACTIONS**

1. All transactions increasing or decreasing the inventory are documented on the daily cash summary. All entries on the daily cash summary must have supporting documentation. The cashier and another employee involved in the transaction must sign the miscellaneous receipt/disbursement form. Interview the cage personnel to determine their understanding of this procedure.

C	N	2C	2N
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2. Jackpot payouts or hopper fills are recorded on the daily cash summary under “jackpot payouts” or “hopper fills”. For jackpots with additional payouts, the amount deducted on the daily cash summary is only the amount paid, not the amount awarded. For example, if a patron wins a \$100 jackpot and a t-shirt with a cost of \$10, the amount deducted on the daily cash summary would be \$100. Ticket payouts, TITO and purchase ticket payouts, are recorded separately on the daily cash summary as “ticket payouts” and “purchase ticket payouts”. Table fills are recorded on the daily cash summary as “table fills”. Table credits are recorded on the daily cash summary as “table credits”. Review the daily cash summary to ensure these accounts are included on the sheet. Keno fills are recorded on the daily cash summary as Keno fills and Keno credits are recorded on the daily cash summary as Keno credits.

C	N	2C	2N
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3. The cashier maintains all paperwork until the end of the shift. At the end of the shift, the off-going cashier reconciles the beginning cash inventory to the ending cash inventory by accounting for all transactions on the daily cash summary and lists any overages or shortages on the daily cash summary. Review all shift-end paperwork to ensure this is being completed.

C	N	2C	2N
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4. Bills receipted into the cashier cage from the bill validator malfunctions must be recorded as such on the miscellaneous receipt form, along with the machine number. These funds could be part of the slot drop. Interview the cage personnel to determine their understanding of this procedure.

C	N	2C	2N
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5. Any overages or shortages of \$1,000 or more, per shift, that are not resolved within seven days are tracked for the month and reported to the Division by the 5th of the following month. Include a list of the overages/shortages along with the circumstances and results of the investigation for each case. If an overage or shortage involves theft or any indication of unlawful activity, it must be reported to the Division immediately. The amount of the overage or shortage, the investigation performed to determine the reason for the overage or shortage, and disposition must be included in the information emailed to the Division at [dor\\_coloradocasinos@state.co.us](mailto:dor_coloradocasinos@state.co.us). If the reason for the overage or shortage is not determined prior to sending the notification to the Division, a follow-up letter is required upon resolution of the investigation. All overages and shortages must be documented, but only unresolved overages and shortages of \$1,000 or more that are not resolved within seven days must be reported to the Division. **Pursuant to CLGR 30-402, each licensee must immediately notify the Division of the discovery of a violation or of a suspected violation of article 30 of title 44,**

C	N	2C	2N
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**CRS, or the rules and regulations promulgated thereunder.** Interview cage and accounting personnel to determine their understanding of this policy.

6. The off-going cashier immediately forwards all paperwork generated during the shift to accounting personnel or deposits it in a locked accounting box. This includes the cash inventory sheets, daily cash summary, all fill/credit slips, request for fill/credit slips, jackpot payout/fill slips, tickets, and all other documents relating to that shift. Observe the cashier transfer the cage paperwork to determine compliance with this procedure.

C	N	2C	2N
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**ICMP – CASHIER - M. LOCKED DISPENSING MACHINES**

1. Licensees must have a locked dispensing machine for processing slot machine and table games transactions and for use in the event of any system failure. The locked dispensing machines are located in the cashier cage. Verify there is a locked dispensing machine.

C	N	2C	2N
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2. When the locked dispensing machine(s) is empty, the cashier calls accounting. Accounting personnel obtain the next numerical sequence from where the forms are secured and complete the forms control log. The accounting person requests the key for the locked dispensing machine from the cashier through the gaming manager. On a periodic basis, frequent enough to detect unusual transactions on a timely basis, but at least once each slot drop period, an accounting person obtains the pink copies of the jackpot payout/fill slips, fill/credit slips, and table games jackpot payout slips from the dispensing machine(s) and refills the dispensing machine(s) with the next numerical sequence. The key is returned to the cashier through the gaming manager and the accounting person transports the pink copies to accounting. In the event the dispensing machine(s) run out when accounting is closed, the cashier will request the owner/operator or the gaming manager to open the dispensing machine(s) in order to fill it. When this occurs, the pink copies are left intact in the machine until the following day when accounting personnel retrieve the pink copies from the dispensing machine. Interview the cage personnel to determine their understanding of this procedure.

C	N	2C	2N
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3. The gaming manager may refill the locked dispensing machine(s) or fix jams. In the event the dispensing machine(s) is full of pink copies and the Accounting Department is closed, the gaming manager may remove the pink copies in the presence of another licensed employee, preferably from security. The gaming manager must immediately deposit the pink copies into the locked accounting box. When delivering the pink copies to the locked accounting box, the gaming manager must be escorted by another licensed employee, preferably from security. The entire transaction must be under surveillance. Furthermore, this internal control procedure must not be used as a substitute procedure for accounting personnel removing the pink copies from the locked dispensing machine on a timely basis. Interview the cage personnel to determine their understanding of this procedure.

C	N	2C	2N
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**ICMP – CASHIER - N. CHECK CASHING**

1. Checks for participation in limited gaming by patrons may be accepted at the cage or authorized ticket issuance/redemption kiosk. All checks receipted or accepted into the cage

C	N	2C	2N
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shall be considered received for participation in limited gaming, unless documented and accounted for separately as non-gaming funds (including, but not limited to, food and beverage, hotel, service and product sales). **The objective of the documentation is to provide an audit trail that clearly distinguishes checks accepted for non-gaming purposes.** Once receipted or accepted into the cage, checks may only be repurchased by the maker thereof after the check has been dishonored by the maker's financial institution. Checks are not accepted under conditions, terms or agreements, which render them not payable on demand. Such circumstances include, but are not limited to, post-dating of checks, unsigned checks, and holding checks out of the next deposit made after acceptance of the check. Interview cage personnel to determine their understanding of this requirement.

2. No licensee will accept a check issued for participation in limited gaming from any patron under the following circumstances: when the maker or endorser of a third party check has previously issued or endorsed a check to the licensee for any purpose, and the licensee has actual notice, or 24 hours constructive notice, that the previously issued check has been dishonored, and the claims of the licensee against the maker or endorser of the check have not been satisfied in full (whether by accord and satisfaction, payment, or liquidation of judgment); when the licensee, through the exercise of reasonable diligence, should have known that the check being considered for receipt into or acceptance at the cage might be dishonored and when action taken by the licensee has rendered a debt uncollectible in an effort to circumvent the extension of credit rules pursuant to CLGR 30-1308. An exception is when a licensee utilizes a third party check processor, including but not limited to a check guarantee company, who absolves the licensee of any and all risk in the event the check is dishonored. In this case, the licensee may accept such check even if the licensee is aware of any previously dishonored checks for which the licensee pursued, or is pursuing, collection efforts. Interview cage personnel to determine their understanding of this requirement.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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3. The licensee must have detailed written procedures regarding check cashing policies and procedures including checks that are accepted at a ticket redemption kiosk. Verify there are detailed written procedures regarding check cashing. Interview the cage personnel to determine their understanding of the policies and procedures.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**ICMP – CASHIER – O. KIOSK FILL PROCEDURES**

1. At a minimum, three licensed employees are required to complete a kiosk fill (these must include a cashier, one employee independent of the cashier cage (verifier) and another licensed employee). When the kiosk needs a fill, a two-part kiosk disbursement form is used to record the transaction. The licensee's name, date, time, kiosk identification number, and amount by denomination must be recorded on the disbursement form. The design of this form is at the licensee's discretion. The cashier and the licensed employee independently count the fill monies. The cashier completes the disbursement form. The cashier and the licensed employee sign the two-part kiosk disbursement form attesting to the funds leaving the cage. The cashier dispenses the funds and the original copy of the form to the licensed employee. The cashier maintains the second copy of the form. Observe and review to

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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determine compliance with this procedure.

- The licensed employee and verifier (independent from the cage) proceed to the kiosk with the original copy of the disbursement form and the funds. The funds are placed in the kiosk and the verifier signs the disbursement form attesting to the placement of the funds in the kiosk and the completion of the transaction. The licensed employee must print the kiosk report that details the dollar amounts required to fill the kiosk. Observe and review to determine compliance with this procedure.

C	N	2C	2N
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- The original copy of the disbursement form and the kiosk report that details the dollar amounts required to fill the kiosk must be immediately forwarded to the accounting office or dropped into the locked accounting box by the independent verifier. Observe and review to determine compliance with this procedure.

C	N	2C	2N
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- If the licensee chooses to prepare kiosk cassettes prior to being requested, two cashiers must be present at the time the cassettes are filled. Each cashier must perform an independent count of the funds going into the cassette. If a second cashier is not available, the gaming manager or gaming manager designee may perform this function. Alternatively, two cashiers are present and place the monies in the currency counter, verify the amount and denomination, place the monies in the cassette and seal or lock the cassette. The currency counter tape is considered the second count as long as there are two cashiers running the counter. The currency count tape is signed by both cashiers involved. The licensee may replace two count members for the cashier duties stated above if fills are being completed in the count room during the count. Interview cage personnel to determine their understanding of the policies and procedures.

C	N	2C	2N
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**ICMP - CASHIER – P. CURRENCY TRANSACTION RECORD KEEPING**

- The licensee shall maintain a log as required by 31 CFR 103.36. If the patron's information required to complete this log is not available through casino records and the patron does not provide the required information, the transaction must be stopped and the licensee must notify the Division. The matter shall proceed as defined in the CLGR 30-417 – Patron Disputes. Interview the cage personnel to determine their understanding of this procedure.

C	N	2C	2N
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**ICMP – GENERAL - D. INTERNAL CONTROLS & THE CONTROL ENVIRONMENT**

- Ensure that approved ICMP variances for cashier cage are located in the cage for easy reference.

C	N	2C	2N
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**Additional comments:**

**Review Recap**

*Initial Review*    *Follow-up*

(1) Total items tested                      \_\_\_\_\_    \_\_\_\_\_

(2) Total noncompliance items            \_\_\_\_\_    \_\_\_\_\_

**ICMP Compliance Checklist: Section 10, KEY CONTROL**  
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Licensee Name	<b>Review Recap</b>		
Prepared By			
Period Reviewed (ICO Use Only)		Initial Review	Follow-up
Date & Time Completed	(1) Total items tested		
Date Follow-up Performed	(2) Total noncompliance items		

**DIVISION OF GAMING USE ONLY**

Employee Signature & License #

Casino Manager Signature & License #

**ICMP – KEY CONTROL – A. GENERAL**

1. Keys to restricted areas are kept in two-keyed locked boxes securely attached in the cashier cage and clearly visible by surveillance. Verify the location of the restricted boxes. The cashier is responsible for ensuring that only authorized employees are allowed to check out restricted keys. Interview cashier and determine their understanding of the procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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2. The cashier is also responsible to ensure restricted keys are returned in a timely manner and that all keys are properly accounted for at the end of the shift. The cashier performs a review of the key logs at the end of each shift to ensure that all restricted keys accessed throughout the shift, which are not currently in use (e.g., by the drop or count teams, slot machine repair, BV repair, etc.) have been returned to the appropriate locked boxes. In the event the keys have not been returned, the cashier is to notify the gaming manager. Review keys logs to determine compliance with this procedure. Interview cashier and determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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3. Unless otherwise indicated in the ICMP, all restricted keys must be immediately returned to their applicable restricted key box(es) once the licensee has completed the task for which the keys were checked out. Observe procedures and interview casino personnel who have access to restricted keys to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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4. Restricted gaming keys are not allowed off the premises; however, the slot door and kiosk door keys may be carried anywhere, with the exception of an off-site storage facility, on the premises in conjunction with the individual's regular responsibilities while on duty. Slot tech keys (including the slot door key) may be taken to a sister casino if the casinos are connected by a doorway or pass-through. These keys are NOT allowed to be taken off premises when the individual is not on duty. If slot tech keys need to be taken to an off-site storage facility, the licensee must send an email notification to [DOR\\_CCBHCasinos@state.co.us](mailto:DOR_CCBHCasinos@state.co.us) or [DOR\\_CrippleCreekCasinos@state.co.us](mailto:DOR_CrippleCreekCasinos@state.co.us), as applicable, including a detailed summary of what keys were taken offsite, the names of the three

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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# ICMP Compliance Checklist: Section 10, KEY CONTROL

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licensed individuals (one of whom is from Security) who accompanied the keys and how long the keys were off-site. The email notification must be received within 24 hours of the keys being taken off premises. If it is suspected there was unauthorized use of a restricted key, suspicion of criminal activity in regard to a restricted key, or if a restricted key is missing, the Division must be immediately notified. Additionally, the key control log must indicate any such activity. Observe procedures and interview casino personnel who have access to restricted keys to determine their understanding of this procedure.

5. Locks requiring the use of restricted keys must be keyed differently in order to maintain an adequate control environment.

- Verify the key used to access the slot machine door is not keyed the same as the key used to access the drop door.
- Verify the key used to release the slot machine bill validator (BV) is not keyed the same as the key used to release the kiosk stacker.
- Verify the key used to access the contents of the slot machine bill validator (BV Content Key) is not keyed the same as the key used to access the contents of the kiosk stacker (Kiosk Stacker Content Key).

C	N	2C	2N
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6. Restricted and non-restricted keys may not be keyed the same. For example, the BV Release key may not be keyed the same as the Belly Glass Door Key. Also, one person may not have the BV Release Key and the BV Content Key at the same time. Interview cashier and determine their understanding of these requirements.

C	N	2C	2N
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7. Non-restricted gaming keys may not be kept in the security (box 1) or gaming manager (box 2) locked boxes. General (non-restricted) gaming keys be maintained in a separate locked box #3 (box 3). Two locks are not required on box 3 but there must be procedures in place to ensure the accountability of the keys maintained in the non-restricted key box. Verify non-restricted keys are not located in the restricted key boxes.

C	N	2C	2N
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8. Between shifts, restricted and non-restricted keys may be transferred to the individual responsible for the keys during the following shift by having that individual sign the key log. The cashier does not need to initial the log or physically transfer the key(s) to the following shift individual. Observe or interview casino personnel and determine their understanding of this procedure.

C	N	2C	2N
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9. Restricted keys must be inventoried at least twice a year. This includes **all** locked boxes containing restricted keys. This may be accomplished in conjunction with the completion of the compliance checklists by the internal compliance officer. Evidence of the inventory must be documented and must include the information outlined in the ICMP. Verify the inventories were conducted and the documentation includes the required information.

C	N	2C	2N
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10. One person may not have access to more than one key box. For example, if one employee is considered the gaming manager and is also acting as security, this person may not have both the gaming manager's key and security's key which are used to access boxes 1 and 2. The gaming manager's key and security's key used to access boxes 1 and 2 must be

C	N	2C	2N
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maintained by two different licensed individuals. Verify that casino personnel, who have access to keys to box 1 and 2, do not have both keys; also interview these individuals to determine their understanding of this requirement.

11. No keys are to remain inserted into the locks of boxes that provide access to restricted keys. The cashier, gaming manager, and security must maintain control over their key at all times. Verify no keys are left in the locks.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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12. Locked boxes utilized for an Automated Key Tracking System (AKTS) must be securely attached to an area clearly visible by surveillance. Verify the location of the AKTS box meets this requirement. Boxes 1 and 2 are securely attached to an area clearly visible by surveillance in the cashier cage. Access to keys or areas accessed through the use of restricted keys is limited to only authorized individuals. Key authorization is granted through the use of key authorization logs or signature cards for a manual key control environment and utilization of AKTS. The AKTS must accurately reflect the authorization reflected on the log or signature cards.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**ICMP – KEY CONTROL – B. KEY CONTROL ENVIRONMENT**

1. The following restricted keys are maintained in locked box 1 (security box). List the key number associated with each restricted key. Verify only the allowable restricted keys are maintained in this box.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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<b>KEY</b>	<b>KEY NUMBER</b>	<b>KEY</b>	<b>KEY NUMBER</b>
Table drop box rack key		Kiosk cassette release key	
Table drop box and EBT release key(s)		Kiosk stacker rack key	
Table multi-shift drop box shift change key		Handheld validation unit (floor & table) cabinet key	
Card cabinet key		Count room key	
Dice/Tiles/Card cabinet key (primary & secondary storage)		Vault key (owner/operator/designee)	
Slot machine drop key		Calibration module key	
Bill validator rack key		Duplicate key locked box (security)	
Bill validator release key		Duplicate key to the two keyed drop key box (security)	
Emergency BV drop cabinet key		BV release two keyed locked box (security)	

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Kiosk stacker release key		Unused excess chips and tokens (security)	
Kiosk door key (security)			

2. One access key to locked box 1 is kept in the cashier cage and the other key is maintained by security. Both keys are required to open the locked box. Verify the location of the keys.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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3. The following restricted keys are maintained in locked box 2 (gaming manager box). List the key number associated with each restricted key. Verify only the allowable restricted keys are maintained in this box.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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KEY	KEY NUMBER	KEY	KEY NUMBER
Table drop box and EBT content key(s)		Vault key (gaming manager)	
EBT door key		Calibration module key	
Slot machine door key (may also have meter keys on ring)		Duplicate key locked box (gaming manager)	
Bill validator content key		Duplicate key to the two keyed drop key box (gaming manager)	
Kiosk stacker content key		Duplicate of slot tech key to BV release two keyed locked box	
Kiosk door key (gaming manager)		W-2G reset key	
Locked dispensing machine key (whiz box)		Unused excess chips and tokens (gaming manager)	

4. One access key to locked box 2 is kept in the cashier cage and the gaming manager maintains the other key. Both keys are required to open the locked box. Verify the location of the keys.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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5. The slot tech key rings containing the slot door keys, meter reset keys, and other non-restricted keys, can be maintained in a separate dual locked box (e.g., slot tech locked box) in addition to box 2. This separate box must be under surveillance and may be located in the slot supervisor's office, gaming manager's office, surveillance room, security office or similar secure area. Access to the box is restricted to the slot techs and gaming manager. Both individuals maintain control of their respective key and both must be present to access the box. Keys from the box are checked out and checked in on the key access log located near the box. The log is forwarded to accounting once a page is completed. Observe or interview slot and management personnel and determine their

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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understanding of this procedure.

6. Verify two slot key rings contain only keys allowed to be on these rings (i.e. no other restricted key other than slot door keys). Document the keys on the rings.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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7. The licensee may have someone from security check out the BV Release Key to slot machines and EBT's for the entire shift. Two licensed individuals, one of which must be security, must be present when the BV Release Key is used. Observe or interview security personnel and determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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8. Access to the kiosk stacker requires a minimum of two individuals. If the kiosk requires two door keys, one key must be maintained in box 1 and the other in box 2. The door keys may be checked out for the entire shift by two separate individuals. Both individuals must be present when the kiosk is accessed. The Kiosk Stacker Release Key may be checked out for the entire shift by one of the individuals maintaining one of the door keys. If the kiosk requires one door key (maintained in box 2) and one Kiosk Stacker Release Key (maintained in box 1), these keys may be checked out for the entire shift by two separate individuals. At no time may just one individual access the kiosk funds. Observe or interview casino personnel to determine their understanding of these procedures.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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9. The Count Room Key must be immediately checked in once the licensee has completed the task for which the key was originally checked out. When accessing the count room for purposes other than drop and count, it is not required for a second person to escort the person receiving the key, provided there are no unsecured funds in the count room. Observe or interview casino personnel to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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10. Access to the vault requires dual access (i.e., two individuals, each with a unique key or lock combination). One key or lock combination is kept in the possession of the owner/operator (or their designee) and the other in the possession of the gaming manager. Alternatively, the two keys to the vault may be kept in the two-keyed locked boxes, one key in box 1 and the second key in box 2. Observe or interview casino personnel to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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11. If the licensee elects to secure the weigh scale with a lock and key, the key is maintained by the manufacturer or manufacturer's representative. Alternatively, the key may be maintained in either box 1 or box 2, with only the manufacturer or manufacturer's representative having authority to obtain the key. The manufacturer or manufacturer's representative must sign the key access log when checking the key out. Observe or interview casino personnel to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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12. Dual locks are required for the duplicate key box. If the licensee does not have a vault, the duplicate keys must be stored in a two-keyed locked box in the accounting office, in the security office, or in another secure area limiting access to authorized personnel only. One key to the locked box for the duplicate keys is maintained in box 1. The second key to

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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the duplicate key box is maintained in box 2. The duplicate key box must be in a secure location and must be under surveillance coverage. Verify the location of the duplicate key box and determine compliance with these requirements.

13. The licensee may establish a Drop Key Box, which is a two -keyed locked box. The Drop Key Box must be under surveillance and must be secured to prevent unauthorized access. The objective is to preclude access to the Drop Key Box by one individual. Two separate licensed individuals must each maintain one key to the Drop Key Box. The drop/count team leader maintains one key to this box. A duplicate of the drop/count team leader's key is maintained in box 2 in case any drop keys need to be checked out and the drop/count team leader is not present. The second key to access this box is maintained in box 1 or by another drop team member. If the (security) key to the Drop Key Box is not maintained by another drop team member, it must be checked out from the cage or AKTS. It must take two licensed individuals to access the Drop Key Box and a key log must be maintained to document key check out and key check in. The key log is forwarded to accounting once a page is complete. For any break taken either prior to or during the drop and count, all keys should be checked back into the Drop Key Box. At the conclusion of the break, all keys should be checked out again pursuant to standard key check out procedures. Alternatively, the keys may be maintained by at least three count team members who are required to stay together and are under surveillance at all times. The drop/count team(s) may only obtain the keys necessary to perform their respective function, and the keys must be returned to the Drop Key box immediately upon completion of that function. (Additional keys that may be maintained in the Drop Key box: (1) slot machine door key, if it is necessary to access the BV stacker; (2) key to storage of test money maintained in the count room; (3) keys needed to drop/count kiosks; and (4) keys needed to count table games). Verify only the keys per the ICMP are maintained in the Drop Key Box.

C	N	2C	2N
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14. The licensee may establish a BV Release Key Box, which is a two-keyed locked box. The slot tech maintains one key to this box and security maintains the other key. A duplicate of the slot tech's key is maintained in box 2. Security's key is maintained in box 1. The controls and procedures for checking out the BV Release Key are the same as for checking out any restricted key. It takes two licensed people to access the box and a key log must be maintained to document key check out and key check in. The BV Release Key is checked in and out of the key box as repairs are needed. The BV Release Key Box must be under surveillance and must be secured to prevent unauthorized access. Verify the location of the box meets this requirement. Interview slot personnel and determine their understanding of this requirement.

C	N	2C	2N
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15. Some slot machines allow patrons to have won credits greater than the hopper lock out amount to continue playing these credits once the slot attendant resets the game. If a jackpot of \$1,200 or more occurs on one of these slot machines, a W-2G must be completed. To reset the game and allow the patron to continue playing these credits, the attendant uses a second reset key switch (which is in the same proximity as the jackpot reset key switch). The casino must replace the lock shipped with the machine with a casino specific lock and key before these games can be played. This key, called a W-2G reset key, is

C	N	2C	2N
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considered a restricted key and must be stored in box 2.

16. If unused and excess chips and tokens are stored in a dual locked area, one key is maintained in box 1 and one key is maintained in box 2.

C	N	2C	2N
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17. Each table's progressive controller box must be housed such that access to the controller requires dual access, which may not necessarily be accomplished through the use of two keys.

C	N	2C	2N
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### OTHER KEY CONTROL PROCEDURES

1. The Slot Machine Door Key, EBT Door Key, BV Release Key Box Key, EBT BV Release Key, TG BV Release Key, BV Release Key (see requirements noted above), Kiosk Door Key, Kiosk Stacker Key, and Handheld Validation Unit Cabinet Key may be checked out at the beginning of each shift for the entire shift. In between shifts, the keys may be transferred to the authorized individual responsible on the following shift by having that individual sign the key log. The cashier does not need to initial the log or physically transfer the key. Licensees utilizing an AKTS may not transfer keys between individuals. Keys must be returned to and checked out of, the AKTS. Interview casino personnel to determine their understanding of these procedures.

C	N	2C	2N
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2. All BV boxes must have a lock to restrict access to the box contents. This lock must be keyed differently than the BV Release Key, as well as the Slot Machine and EBT Door Key. Verify the locks are keyed differently.

C	N	2C	2N
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3. All table game drop boxes must also have a lock to restrict access to the box contents, which must be keyed differently than the key to release the box or EBT BV from the table. Verify the locks are keyed differently.

C	N	2C	2N
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4. If slot count and table games count are performed in separate rooms, each room must be keyed differently so that slot count team members may not gain unauthorized access to the table games count room and vice versa. Verify the locks are keyed differently. Interview count personnel and determine their understanding of this requirement.

C	N	2C	2N
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5. Broken keys, or keys for locks that have been changed, may be destroyed and discarded at the licensee's discretion, or given to a locksmith to destroy. If a duplicate key is issued in place of a broken key, the duplicate key control log must indicate this as the reason for removal of the key from the duplicate key locked box. Interview personnel responsible for key destruction and replacement to determine their understanding of these procedures.

C	N	2C	2N
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### ICMP – KEY CONTROL – C. KEY CONTROL LOGS

1. Regardless of whether a manual or an AKTS environment is in place, access to all restricted keys must be documented. Key control logs must be located near the associated key box. The entire transaction of checking keys out/in and recording of such is captured by a single surveillance camera. Observe the process and determine compliance with this procedure.

C	N	2C	2N
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2. In a manual environment, key logs are used to document key access. A key control log is kept for each locked box and is completed every time a key is checked out or in. The key logs, with exception of the Duplicate Key Control Log, are forwarded to accounting for review once a page is complete, but at least monthly. The Duplicate Key Control Log should be forwarded to accounting once a page is completed but at least annually. Key logs must include the following information:

C	N	2C	2N
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- Date of issuance.
- Time of issuance
- Signature and gaming license number of the individual receiving the key (the person receiving is the person who will be using the key to complete a procedure).
- Key number.
- Reason for removal of key (e.g., perform table games drop, perform slot drop, etc.). The description must be detailed so a reviewer can determine what the key was used for.
- Initials of cashier issuing key (if manual system is used).
- Initials of gaming manager or security employee witnessing issuance of key.
- Date of return.
- Time of return.
- Initials of individual accepting the return of key (i.e., cashier) if manual system is used.

Review the key logs and determine all the required information is included.

3. When a key is requested in a manual environment:

- The employee requests a key from the cashier. The cashier verifies that the person requesting the key has authority. If the person does not have authority the cashier denies access. Randomly select at least five entries on each key log (e.g., security and gaming manager logs) and compare to the authorization logs.

C	N	2C	2N
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- If the employee has the authority, the key log is completed, noting the time and date out and the reason for removal (e.g., table games drop, slot count, etc.). The cashier records the key number, initials the log, gives the key to the authorized person, and the key log is signed by the employee taking responsibility for the key. The person signing the key control log is the person ultimately receiving the key (e.g., drop/count team leader). Observe the manual key check out process and determine compliance with this procedure.

C	N	2C	2N
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- When restricted keys are signed out, the gaming manager or security employee who authorizes the key check-out by providing the cashier with their locked box key also initials the log. The gaming manager or security employee must be present and observe the key check-out and key check-in processes. Observe the key check out process and determine compliance with this procedure.

C	N	2C	2N
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- d. When the key is returned, the cashier accepts custody and responsibility for the key by recording the time, date in, and initialing the key control log.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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- e. The cashier immediately places the key back into the key box, locks the box, and removes the access keys. Observe the key check in process and determine compliance with this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**ICMP – KEY CONTROL – D. TABLE GAMES AND PIT PODIUM KEY CONTROL**

1. The Table Drop Box Release Keys maintained in box 1 may be keyed the same for Blackjack, Poker, Craps and Roulette. The Table Drop Box Content Keys maintained in box 2 may be keyed the same for Blackjack, Poker, Craps and Roulette. However, the Table Drop Key Box Release Keys must be keyed differently than the Table Drop Box Content Keys. EBTs have individual main door access locks similar to slot machines. Follow the slot machine requirement for key control. Determine compliance with this requirement.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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2. The Table Drop Box Release Key used to drop either the drop box or the poker jackpot award drop box can be the same key. The key to access the contents of either the table drop box or the poker jackpot award drop box can be the same key. However, the Table Drop Box Release Key for the drop box and poker jackpot award drop box must be keyed differently than the Table Drop Box Content Key. Determine compliance with this requirement.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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3. The keys to the pit podium and table trays may be, but are not required to be, kept in box 1 or box 2. Access to the pit podium and table tray keys is limited to the pit supervisor, table games manager or gaming manager. If a pit podium bank is utilized, it must be keyed separately. Access to the pit podium bank is limited to the employee responsible for maintaining control over the assigned bank. Determine compliance with these requirements.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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4. The Card Cabinet Key may be the same as the Dice Cabinet Key (primary and secondary storage) as long as adequate inventory controls are established for cards and dice. Primary storage must be established by the licensee for extra dice. This area shall have two separate locks with one key maintained in box 1 (security) and the second key maintained by the table games manager or pit supervisor. A secondary dice storage area is optional and the two locks may be keyed the same as the two locks on the primary storage area. Determine compliance with these requirements.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**ICMP – KEY CONTROL – E. AUTOMATED KEY TRACKING SYSTEM (AKTS) SYSTEM ADMINISTRATION**

1. The system administrator(s) must be **KEY** licensed employees. This person(s) shall appropriately configure the AKTS to ensure proper authorization and access to restricted keys. Determine compliance with this requirement. Document the names and key license numbers of all system administrators:

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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2. The AKTS access permissions must be configured in order to distinguish a key licensed employee performing in the capacity of the system administrator from the same individual accessing the system to perform their normal job functions (e.g., gaming manager). Interview the AKTS administrator(s) and verify compliance with this requirement.

C	N	2C	2N
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3. Key authorization logs or signature cards must be maintained for an AKTS. The system permissions must accurately reflect the authorization reflected on the log or signature cards. In the setup of the AKTS, no access shall be granted that would allow any one individual sole access to restricted keys with ② in the key inventory diagram shown in the ICMP. Review the logs/cards and verify they contain all the required information. Access to the keys must be controlled through appropriate access permissions. This may include, but is not limited to, the use of passwords that provide access to the keys. Review a sample of employees and determine if the permissions granted in AKTS agrees with the logs/cards.

C	N	2C	2N
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4. To preclude unauthorized access, system access for terminated (voluntary or involuntary) users must be removed from the system as soon as possible but no later than 72 hours after the effective termination date. Review a sample of employees and determine if their access was removed from the system in a timely manner.

C	N	2C	2N
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5. Any time the system administrator allows access to the AKTS locked boxes to perform maintenance, cleaning of the keys or any other purposes, the person accessing the keys must be accompanied by security personnel during the entire time of access. This access must be documented with the name of the individual accessing the keys, security personnel name and license number observing the access, the date and time of access and the reason for access. Interview the system administrator and determine their understanding of this procedure. Review the documentation and determine if it contains all the required information.

C	N	2C	2N
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### SYSTEM OPERATION

1. At the end of each gaming day the gaming manager or security personnel must generate AKTS reports documenting any restricted keys currently not stored in the AKTS. A review of the reports must be performed to ensure all restricted keys accessed throughout the gaming day which are not currently in use (e.g., by the drop or count teams, slot repair, on-duty employees, etc.) have been returned to the AKTS. Evidence of this review is forwarded to accounting after the review is complete. Interview personnel responsible for reviewing the reports and determine their understanding of the procedure. Review the reports and determine if there is adequate documentation.

C	N	2C	2N
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2. If any keys have not been returned, an investigation must be immediately initiated. The investigation must be documented and include, at a minimum, the key description, last person accessing the key, investigation performed and by whom, and the results of the investigation. This documentation is immediately forwarded to accounting. Interview personnel responsible for reviewing the reports and determine their understanding of the procedure. Review the reports and determine if there is adequate documentation.

C	N	2C	2N
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### SYSTEM ACCOUNTABILITY

1. The AKTS must be monitored and reviewed by personnel who are independent of the AKTS administrator functions. The licensee must maintain a list, which includes the name, license number and title of each AKTS administrator. Determine compliance with these requirements.

C	N	2C	2N
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2. Accounting personnel must perform a review of reports generated by the AKTS that document key transactions. This review is performed on a timely basis (as defined in the written accounting plan) to ensure all restricted keys are returned within a reasonable amount of time pursuant to the completion of the task that created the need for the key(s) removal and to ascertain if any unusual key removals or key returns have occurred. Timely investigations must be performed for any missing restricted keys, improper transactions, and/or unusual occurrences. The report(s) review must be evidenced by the reviewer's signature and date of review. Determine compliance with these requirements.

C	N	2C	2N
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3. Accounting perform a review of reports generated by the AKTS that document transactions performed by system administrators. This review is performed on a timely basis (as defined in the written accounting plan) to determine whether the transactions completed by system administrators provide adequate control over access to restricted gaming keys. This review is to determine whether the system administrator's transactions were proper, reasonable, and authorized. Any time persons are added to or removed from the system, accounting personnel compare the key authorization logs or signature cards to the system information to ensure that key access within the system is appropriate. Any time inappropriate access is discovered or suspected, surveillance coverage of the AKTS and any related areas must be reviewed. The surveillance coverage must be maintained until such time there is a resolution to the investigation. Accounting's review is evidenced by the reviewer's signature and date of review. Determine compliance with these requirements.

C	N	2C	2N
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### AKTS FAILURE

1. The licensee must have procedures in place that adequately address key control in the case of an emergency or an AKTS failure. These procedures must ensure access to restricted keys requires the physical involvement of the gaming manager and security personnel. The key control logs used in a manual environment are used in this situation. Interview management personnel and determine their understanding of the procedure.

C	N	2C	2N
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2. If at any time the emergency release access is utilized, the gaming manager and security personnel must be present to access the keys. Each occurrence must be documented and the Division must be notified immediately in writing. The notification must include the date and time of access, the reason for the access, and the name and license number of all personnel involved in the access. Interview management and surveillance personnel and determine their understanding of the procedure.

C	N	2C	2N
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Revised July 2021

Effective November 2022

# ICMP Compliance Checklist: Section 10, KEY CONTROL

## For Use by Division of Gaming and Independent Compliance Officers (ICOs)

### Legend:

C = In Compliance

N = Noncompliance

2C = In Compliance at Follow-up

2N = Noncompliance at Follow-up

3. Installation and upgrades of an AKTS must be performed by licensed individuals.

C	N	2C	2N
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### ICMP – KEY CONTROL – F. DUPLICATE KEYS

1. Duplicate copies of all restricted keys are locked in the duplicate key box located in the vault and are only accessible by the owner/operator and/or gaming manager along with another licensed employee (i.e., no one person can access duplicate keys alone). The Division requires dual locks for the duplicate key box. Additionally, the duplicate keys to the vault must be properly secured in a manner that limits access to authorized personnel only. If there is no vault, the duplicate keys are stored in a two-keyed locked box, under surveillance, located in a secure area limiting access to authorized personnel only. One key to the duplicate key locked box is maintained in box 1. The second key to the duplicate key locked box is maintained in box 2. Verify where the duplicate key box is located and the surveillance coverage. Verify where the two keys to access the duplicate key box are stored.

C	N	2C	2N
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2. One duplicate key control log sheet is used per restricted key. Each time a restricted duplicate key is received from the locksmith, an entry is made to that key's respective duplicate key control log. When the individual duplicate keys logs are full, the licensee must take the current inventory amount and carry it over to the new log in the area labeled (number of keys from previous page). Judgmentally select at least three different restricted keys and ensure the number of duplicate keys in the duplicate key box agrees to the number of keys listed on the duplicate key control log (one log per key). Determine if the forms have been completed correctly.

C	N	2C	2N
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3. Duplicate restricted keys must be inventoried at least twice a year. This may be accomplished in conjunction with the internal compliance officer completing the compliance checklist. The inventory must be documented. This documentation must include, at a minimum, the names, signatures, license numbers of the individuals performing the inventory count, the date the inventory was performed, and the results of the inventory. Review the documentation and determine compliance with this procedure.

C	N	2C	2N
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4. Upon receiving/removing duplicate keys, the duplicate key control log must always include the following information:

C	N	2C	2N
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- Date/Time
- Number of Keys
- Number of Keys Remaining

Review the documentation and determine all the required information is included.

5. Upon receiving duplicate keys from a locksmith, or making duplicate keys in-house, the duplicate key control log must be completed with the following information (see columns labeled A on the duplicate key control log in Forms section):

C	N	2C	2N
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- Signature and license number of individual receiving key.

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b. Number of keys remaining.

6. If a duplicate key is removed or checked out to an authorized employee for any reason, the duplicate key control log must be completed with the following information (see columns labeled B on the duplicate key control log in Forms section):

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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- Signature and license number of individual issuing key.
- Signature and license number of individual receiving key.
- Reason for removal of key.
- Number of keys remaining.

Review the documentation and determine all the required information is included.

7. If a duplicate key is permanently removed to replace a broken key, the duplicate key control log must indicate this as the reason for removal of the key, and the columns labeled C on the log will be noted as "N/A". Review the documentation and determine all the required information is included.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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8. When the duplicate key is returned, the duplicate key control log must be completed with the following information (see columns labeled C on the duplicate key control log in Forms section). If the duplicate key is transferred to another authorized individual before checking the key in, this must be noted on the log:

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

- Signature and license number of individual returning the key.
- Signature and license number of individual accepting the key.
- Number of keys remaining.

Review the documentation and determine all the required information is included.

**ICMP – KEY CONTROL – G. PROCEDURES FOR NON-OPEN HOURS**

1. If a licensee is not open twenty-four (24) hours a day and utilizes a manual key control environment, the keys to access the restricted two-keyed locked boxes must be secured in a manner that precludes access to the restricted key boxes by any one individual. The licensee must document and have knowledge of where all of the keys to the two-keyed locked boxes are at all times. This could be accomplished through the use of a key log. The key to access the non-restricted key box must also be securely stored in a manner that precludes access by unauthorized individuals. Interview management, cage and surveillance personnel to determine their understanding of this process.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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2. If a licensee is not open twenty-four (24) hours a day and utilizes an AKTS environment, it must be ensured that all restricted keys which are not in use (e.g., by the drop or count teams, slot repair, etc.) have been returned to the AKTS at the close of the gaming day. Interview management, cage and surveillance personnel to determine their understanding of this process.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**ICMP Compliance Checklist: Section 10, KEY CONTROL**  
**For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

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**ICMP – GENERAL – D. INTERNAL CONTROLS & THE CONTROL ENVIRONMENT**

1. Pursuant to CLGR 30-1610(2), each licensee shall establish its own internal control procedures including accounting procedures, reporting procedures, and personnel policies for the purpose of determining the licensee's liability for taxes, fees, and exercising effective control over the licensee's internal fiscal affairs. The licensee's procedures must incorporate the ICMP requirements as established by the Division, or alternative requirements approved by the Division. Ensure that approved ICMP variances for key control are located in the area impacted by the variances.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**Additional Comments:**

**Review Recap**

*Initial Review      Follow-up*

(1) Total items tested      \_\_\_\_\_      \_\_\_\_\_

(2) Total noncompliance items      \_\_\_\_\_      \_\_\_\_\_

**ICMP Compliance Checklist: Section 11, ACCOUNTING**  
**For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

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Licensee Name	<b>Review Recap</b>		
Prepared By			
Period Reviewed (ICO Use Only)		Initial Review	Follow-up
Date & Time Completed	(1) Total items tested		
Date Follow-up Performed	(2) Total noncompliance items		

**DIVISION OF GAMING USE ONLY**

Employee Signature & License #

Casino Manager Signature & License #

**ICMP – ACCOUNTING – A. GENERAL**

**Accounting's Responsibilities**

- The accounting department is responsible for the complete analysis and reporting of all gaming revenue to the required city, county, state, and federal taxing authorities. Accounting is responsible for reviewing, analyzing, comparing, reconciling, filing, and maintaining all source documents. Additional responsibilities include preparing statistical and supporting reports and analyzing and documenting variances noted as a result of reviewing these statistical and other reports, as required by ICMP, to ensure the correct and supported reporting of AGP. Review the written accounting plan and interview personnel if necessary to determine if accounting's duties fulfill these responsibilities.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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- Pursuant to CLGR 30-106(14), all persons who perform daily accounting functions, services or duties for any retailer's or operator's business involving the handling, processing, manipulating, or generating of gaming documentation or funds, must possess a gaming license. Accounting personnel may not participate in any gaming transactions or activities (e.g., drops, counts, fills, cashiering, shift manager functions, etc.) other than reading and recording slot machine meters and table games progressive meters. Review the organization chart and determine all accounting personnel are licensed and duties are properly segregated.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**Written Accounting Plan**

The licensee must develop a detailed Written Accounting Plan, which outlines its methodology, processes and procedures regarding the preparation, review, analysis, and maintenance of the statistical and supporting reports. The objective of the plan is to provide sufficient detail for each member of the accounting staff to adequately perform their job. This plan must include at a minimum:

- Job positions responsible for preparing the reports, reviewing the reports, investigating variances, correcting errant information, and ensuring corrective action have been taken to correct the problem.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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- List of source documents used to obtain meter information, actual information, and the process used to prepare all reports.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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3. Establishing thresholds for variance investigations that are not already specified in the ICMP, and include documentation on how the threshold was established. Thresholds used to:

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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- Initiate the investigations.
- Determine events that signal and initiate a different level of review or investigation.
- Define large or unusual day to day Table Games fluctuations.
- Determine historical hold or expected hold used in Table Games Statistical Reports variance investigations.

4. Procedures for:

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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- Preparing and reconciling the source documents to the reports (cage, table, and drop/count documents). This includes ensuring the accuracy of downloaded information and an adequate audit trail that documents any changes made to the system.
- Reviewing the reports for accuracy, this includes performing the secondary level of review of the reports and any adjustments made to the reports including supporting documentation. Secondary level of review on any required statistical reports must be completed prior to tax return submission.
- Investigating variances that exceed the allowable threshold, includes thresholds used to initiate the investigation, documentation of how the thresholds were established, if not specified in the ICMP, method of documenting variance review and investigation, events that signal and initiate a different level of review or investigation. Correcting errant information.
- Identifying and communicating noncompliance issues to employees.
- Written contingency plan for reconstructing all data in the event of a manual or system failure or other event resulting in data loss including handheld meter capturing devices, weigh scale and/or currency counter equipment and interfaces.
- Escalating month-end reviews for table game types performing at unusual hold percentages for two or more consecutive months.

5. Time frames for each step of the processes (e.g., reports are prepared and reviewed within "number of" days of a drop, variances forwarded to the Slot/Pit Department for investigation are due back to accounting within "number of" days, etc.).

6. Definition of the 24-hour period that constitutes the licensee's gaming day.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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7. If the license operates table games, provide the number of shifts, length of each shift that will be utilized during the 24 hour gaming day, and the days of the week when the pit will be closed for the 24 hour gaming day (if any). Also, include how the shift(s) will be named on gaming documents.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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8. Written procedures for the applicable gaming departments/employees affected to ensure compliance with the Gambling Payment Intercept Act and Regulations.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Does the licensee meet these requirements?

**Adequate Explanation Criteria**

1. The results of all reviews and investigations must be documented, in writing, (adequate explanation criteria) as evidence that required procedures have been performed. Adequate explanation criteria must include:
- The variance being investigated,
  - Date or drop period the variance is associated with,
  - Date the request for investigation was sent to the floor personnel to investigate,
  - Date the results of the investigations are due back to accounting,
  - The detailed procedures used to investigate the variance,
  - The date the investigation was performed and the name of the person performing the investigation,
  - The results of the investigation, and
  - The date and name of accounting personnel who reviewed the investigation procedures and results.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Are variance investigation explanations adequate on all required statistical reports? Are the results of all reviews and investigations documented, in writing, as evidence that required procedures have been performed? Do variance investigations meet the adequate explanation criteria?

NOTE: If you note an issue of noncompliance on the statistical report questionnaire corresponding to this question, mark this question out of compliance.

2. Licensees must implement a process to identify continued variances on the same gaming device from drop to drop in order to initiate a different level of investigation (e.g. an investigation by a more experienced gaming employee, performance of different tests, contact slot manufacturer, contact the Division, etc.). The point at which a different level of investigation should be initiated is specific to each licensee (depending upon the frequency of statistical report generation) and must be incorporated into the licensee's written accounting plan which is discussed above. Interview accounting personnel to determine their understanding of this procedure. Review accounting plan and determine if this is included.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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3. It is the licensee's responsibility to ensure machine problems and thefts are detected in a timely manner. Licensees are taxed on the dollar loss associated with theft from machines and machine malfunctions. Losses as a result of theft or machine malfunctions are not deductible in the calculation of AGP for gaming tax purposes. Interview accounting personnel to determine their understanding of this requirement.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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4. Licensees must have a process in place to escalate month-end table games variance reviews for game types performing at unusual hold percentages for two or more consecutive months. These procedures employed must be included in the licensee's Written Accounting Plan. Review the accounting plan to determine if this is included. Interview accounting personnel to determine their understanding of this requirement.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**System Overrides**

1. Licensees must have written procedures that adequately address overrides to system-generated information on any jackpot/fill slip. The written procedures must be available to those individuals who are involved in the override process. Review the written procedures to determine if it contains the required information.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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2. A supervisory or management employee (i.e., shift manager or gaming manager) must independently authorize system overrides with the exception of rounding up to the next denomination or dollar. Independently authorizing a system override includes the supervisory or management employee visually verifying the correct amount on the slot machine and providing their approval in the system. Interview accounting and floor supervisor personnel to determine their understanding of these procedures and adequacy of their review of overrides. Observe an override to determine compliance with these procedures.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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3. **Procedures must be in place to prohibit one individual from initiating and overriding the same transaction.** Review the written procedures to determine if it contains the required information. Interview accounting and floor supervisor personnel to determine their understanding of these procedures and adequacy of the review of overrides. Observe an override to determine compliance with these procedures.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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4. The Accounting Department must review all overrides for reasonableness and proper authority. This review must be evidenced on the supporting documentation by the reviewer's initials and the date of the review. Interview accounting personnel to determine their understanding of these procedures.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**Secondary Level of Review**

1. To ensure an adequate control environment and proper segregation of duties, all required statistical reports and supporting reports must have an independent (secondary level) review. The person who prepares the required statistical and supporting reports must be someone other than the person who performs the secondary level of review of the reports. Interview accounting personnel to determine their understanding of these procedures.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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2. All reports, and adjustments made to the reports, must receive a secondary level of review. The secondary level of review is an independent review performed by another person who is knowledgeable of the information being reviewed. Secondary level of review is performed to ensure the reports are properly prepared, documented, and accurate. This includes reviewing supporting documentation for all adjustments made to the information reflected

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**2N** = Noncompliance at Follow-up

on the reports. Interview accounting personnel to determine their understanding of these procedures.

3. The first and final run of reports must reflect the preparer's initials and date of preparation. Interview accounting personnel to determine their understanding of these procedures.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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4. The final run of all reports reflects the initials of the person performing the secondary level of review and the date of the review. Interview accounting personnel to determine their understanding of these procedures.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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5. Any corrections by the accounting department to gaming documents, forms, reports, etc., must be made with red ink. These corrections, and any noncompliance items identified by accounting are further processed in accordance with the licensee's written accounting plan. At a minimum, the person making the change initials and dates each correction or the person making the change initials and dates the top or bottom of each page containing any corrections. In the case where reports are reprinted to reflect any corrections and/or adjustments made by accounting personnel (e.g., "final run" reports), corrected and/or adjusted information reflected on these "final run" reports must receive a secondary level of review by someone other than the individual who made the correction/adjustment, as noted above. The first and final run of reports are considered gaming documents and must be maintained for the required time period. Interview accounting personnel to determine their understanding of these procedures.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**Gaming Forms and Documents**

1. The accounting department is responsible for accessing and removing gaming documentation from the locked accounting box. This box is located in a secured location, under surveillance, somewhere other than inside the cashier cage. In conjunction with each drop period, or more frequently, accounting personnel access and remove gaming documentation. Only accounting personnel have access to this box. Does anyone other than accounting personnel have access to the locked accounting box and accounting files? Is the key to the locked accounting box properly maintained? Is access to the key restricted to accounting personnel only? Does accounting personnel retrieve documents from the accounting box timely?

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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2. All records and forms must be maintained in the state of Colorado and are subject to the document retention requirements mandated in CLGR 30-1607. Licensees may store these records by other means, such as electronic imaging. If licensees choose this option, they are still required to maintain the original document if it contains a signature on it, unless otherwise authorized by the Division. These documents can be stored offsite, such as in a storage unit, as long as the location is secure and in the state of Colorado. Licensees must be able to provide all requested documents to the Division in a timely manner. Licensees must also have adequate written backup and recovery policies and procedures to ensure the timely restoration of data (onsite and offsite) in order to resume operating after a hardware or software failure. Interview accounting personnel to determine if the location and length

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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of retention of gaming documents meets the requirements. Interview IT personnel in regards to backup and recovery policies to determine compliance with this procedure.

3. Under no circumstances shall any gaming document, slip, statistical report, etc., be shredded or destroyed in any manner as long as it is still subject to the document retention requirements mandated in CLGR 30-1607. Gaming documents are all source documents, all documents supporting the monthly gaming tax return, all documents used to analyze gaming activity, and all documents showing the accounting review process. Interview accounting personnel to determine their understanding of this requirement.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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4. All gaming forms must be completed in ink. Errors on gaming documents must be lined through and the correction written near the error. Under no circumstances will an entry be written over or modified in any other manner. At least one gaming employee involved in the gaming transaction must initial all corrections, verifying the correction. If an error is made to the grand total on the cash inventory sheet, at least two cashiers must initial the correction, verifying the correction. Error corrections on count paperwork must be approved and initialed by at least two count team members. If an error is made to the grand total amount transferred to the cashier from the count, the cashier must also approve and initial next to the correction. Monetary amounts can be corrected using this procedure only on non-restricted gaming forms. Accounting must ensure gaming documents are properly completed and error corrections are properly made. Interview accounting personnel to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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5. Any noncompliance items identified on gaming forms and documents by accounting are processed in accordance with the licensee's Written Accounting Plan. Interview accounting personnel to determine their understanding of this procedure. Is accounting effective at resolving noncompliance issues? Look at audited gaming documents. Are the same items circled repeatedly? Is there adequate authority in the organization to ensure personnel complete gaming documents properly?

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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6. A restricted gaming form (i.e., Request for Fill/Credit, Fill/Credit, opener/closer table inventory form, Request for Table Games Jackpot Payout slip, Table Games Jackpot Payout/Fill slip, Unclaimed Jackpot receipt, Table Games Payout form, Jackpot Payout/Fill slip, and Slot Tournament Prize form) must be voided when an error in the monetary amount occurs. When a restricted gaming form is voided, "VOID" is clearly marked across the face of the original (white) and all copies. At least two gaming employees involved in the transaction sign and date across the face of the voided slip. The voided slip number is recorded on the replacement slip. One gaming employee involved in the transaction forwards the original and copies to accounting for retention and accountability. Accounting must ensure that gaming forms are voided correctly. Interview accounting personnel to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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7. At the end of each shift and at the conclusion of the count, all documents and supporting forms are immediately forwarded to accounting, either by depositing documents and forms

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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in the locked accounting box located outside the cashier cage, or by delivering them directly to accounting personnel in such a manner as to limit access to authorized licensed individuals only. Are count documents and supporting forms immediately delivered to accounting?

**ICMP – ACCOUNTING – B. TABLE GAMES**

Accounting personnel perform the procedures detailed below and sign gaming forms where appropriate as evidence that accounting procedures have been performed.

1. Are Fill/Credit slips compliant? If you note an issue of noncompliance on the attribute worksheet corresponding to this question, mark this question out of compliance.
 

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------
2. Are Request for Fill/Credit slips compliant? If you note an issue of noncompliance on the attribute worksheet corresponding to this question, mark this question out of compliance.
 

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------
3. Are Table Games Jackpot Payout slips compliant? If you note an issue of noncompliance on the attribute worksheet corresponding to this question, mark this question out of compliance.
 

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------
4. Are Request for Table Games Jackpot Payouts slips compliant? If you note an issue of noncompliance on the attribute worksheet corresponding to this question, mark this question out of compliance.
 

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------
5. Accounting matches all copies of table games unclaimed jackpot receipts slips. If you note an issue of noncompliance on the attribute worksheet corresponding to this question, mark this question out of compliance.
 

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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6. Are opener/closer slips compliant? If you note an issue of noncompliance on the attribute worksheet corresponding to this question, mark this question out of compliance.
 

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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7. Are soft count cards compliant? If you note an issue of noncompliance on the attribute worksheet corresponding to this question, mark this question out of compliance.
 

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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8. Accounting traces fills/credits, openers/closers, table game jackpot payouts, table games ticketing reports, mobile ATM receipts and drop amounts from the soft count cards to the master games sheet. If you note an issue of noncompliance on the attribute worksheet corresponding to this question, mark this question out of compliance.
 

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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9. Are master games sheets compliant? If you note an issue of noncompliance on the attribute worksheet corresponding to this question, mark this question out of compliance.
 

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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10. The owner/operator or the controller/auditor investigates any missing Request for Fill/Credit, Fill/Credit, request for table games jackpot payout, and table games jackpot
 

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

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payout slips. A report is prepared to explain the cause of, and responsibility for, the loss. Interview accounting personnel to determine their understanding of this procedure.

11. The owner/operator, table games management or licensee's equivalent, in conjunction with the appropriate personnel, investigates any large or unusual fluctuations (as defined in the Written Accounting Plan) of the audited master games sheet, including a review of the daily hold percentage for each table for each shift. The Table Games Activity Log and EBT access log should be reviewed at this time to determine if activity affecting hold percentage may be explained. The results of these investigations are documented and used to support the variance investigations performed on the month end table games statistical reports. Interview accounting personnel to determine their understanding of this procedure. Review several explanations for adequacy of the review and documentation.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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12. Noncompliance issues are investigated, resolved, and documented on a timely basis. Interview accounting personnel to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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13. If applicable, accounting reviews and compares the Table Games Activity Log to the table games count documentation and Master Games Sheet. Interview accounting personnel to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**Table Games Tournaments**

1. Accounting reviews the table games tournament entry fee & buy-in logs and:

1. Checks for mathematical accuracy,
2. Ensures proper completion in accordance with the ICMP,
3. Records the total amount collected for the tournament, by shift and day, on the table games tournament summary form and calculates the grand total collected,
4. Documents the total amount awarded in prizes on the summary form,
5. Verifies the total amount awarded as prizes is equal to, or greater than, buy-ins collected, and
6. Completes the Table Games Tournament Summary Form.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Interview the accounting personnel to determine their understanding of the procedure. Were the forms properly completed?

2. AGP for all table games tournaments is equal to all entry fees, including the dollar value of complimentary ("comped") and non-cash entry fees. If an entry fee is required for any one player in a tournament, all players must have an equal entry fee. All entry fees must be included in the calculation of AGP regardless of how the entry fee is accepted. It can be in the form of cash, points redeemed for cash, comped (free entry provided by the casino), or non-cash item and any combination thereof. If prizes awarded are merchandise, the cost of the merchandise, not the market value, must be equal to or greater than, the buy-ins collected for the tournament. Have all entry fees been accounted for? Review forms to ensure all players have equal fees.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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3. AGP from all tournament is included in the total amount of the drop for the applicable game type on the gaming tax return for the month in which the entry fees were collected. Trace AGP from the last four tournaments to the Tax Return. Note the tournament name, date(s) of tournament, dollar amount collected in entry fees and buy-ins, dollar amount of prizes, dollar amount of AGP, and results.

C	N	2C	2N
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4. If prizes awarded are merchandise, the cost of the merchandise, not the market value, must be equal to or greater than the buy-ins collected for the tournament. If the actual cost of all prizes awarded exceeds the amount received in tournament buy-ins, the licensee may not declare a loss against AGP. Proper documentation must be maintained to support the cost of the merchandise, such as invoices. Merchandise given to patrons for entering the tournament is not considered a prize. Improperly completed table games tournament forms may result in a disallowance of the associated awards in calculating AGP for gaming tax purposes. All disallowed awards will be considered additional entry fees in calculating AGP for gaming tax purposes. Were the forms properly completed? Was AGP properly calculated?

C	N	2C	2N
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**Multi-Licensee Tournaments**

1. In addition to the above procedures for tournaments, the following applies for licensees participating in a multi-licensee tournament(s):
- The licensees participating in a multi-licensee tournament must designate one licensee to be responsible for maintaining all tournament documentation and to ensure proper escrow of prizes and proper awarding of all prizes.
  - No entry fee may be collected and therefore, no taxable AGP may result from multi-licensee tournaments. The total amount of buy-ins collected must be equal to, or less than, the total amount awarded in prizes. If prizes awarded are merchandise, the value of the prize is the cost of the merchandise, not the market value.
  - At the beginning of each day, the accounting staff will deliver a copy of the log for all shifts of the previous day to the licensee designated to be responsible for the tournament. At the conclusion of the multi-licensee tournament, all participating licensees will forward all original tournament documentation to the licensee designated to be responsible for the tournament.

C	N	2C	2N
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Interview your accounting personnel to determine their understanding of this requirement.

**Poker Jackpots Awards (Player Banked Games Only)**

1. Accounting reviews the original (white) and copy (yellow) of the table games payout form and poker jackpot count card(s), and:
- Checks for mathematical accuracy.
  - Ensures proper completion in accordance with the ICMP.
  - Accounts for the numerical sequence of the table games payout forms, and
  - Determines that no slips are missing or unaccounted for.

C	N	2C	2N
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Interview your accounting personnel to determine their understanding of this procedure. Were the forms properly completed?

2. On a monthly basis, accounting must agree the jackpot liability, as recorded on the copy (yellow) of the poker jackpot count card, to the amount shown on the poker jackpot log. The total of the jackpot amounts awarded per the table games payout form(s) for each patron must agree to the jackpot liability as recorded on the poker jackpot log. Accounting investigates and documents the reason for any differences. If a difference cannot be resolved, accounting must contact the Division for resolution. Interview accounting personnel to determine their understanding of this procedure. Were the forms properly completed and reconciled?

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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3. A poker jackpot log must be maintained. Someone independent of the poker room must record the amount of the jackpot award liability each day the pit is open for any part of the 24 hour gaming day. This log is forwarded to accounting once a month or whenever a jackpot is awarded. Accounting must ensure all decreases are reasonable and properly explained. The explanation must include a reference to the table games payout form numbers documenting the jackpot award payout. Interview accounting personnel to determine their understanding of this procedure. Review the log to determine compliance with this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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4. Accounting must file a form 1099-M with the IRS at the end of the calendar year for any patron receiving aggregate jackpot award distributions of \$600 or more. Other reporting/withholding requirements may apply to monies paid out as a jackpot award. For additional information on reporting/withholding requirements, please contact the IRS. Is this requirement being met?

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**Table Games Progressive Procedures**

Pursuant to CLGR 30-1254(3), licensees must establish control procedures that can explain and/or reconcile any increase, reduction or discontinuance of all progressive jackpots offered for patron play. This documentation must be made available to Division personnel upon request.

**Table Games Reports**

***Master Table Games Summary Reports***

On a timely and periodic basis, accounting personnel must complete the Master Games Summary Reports, which provide support for the monthly gaming tax return. It summarizes the total column on the master games sheet, by day, for a one-month period. For table games, except player banked poker, it includes closing inventories, drops, credits, fills, hand paid jackpots, opening inventories, redeemed tickets and net win. For player banked poker, it includes the poker rake and poker jackpot rake. Table game information may be combined on one report as long as the information for each game is shown separately. Interview accounting personnel to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**Table Games Statistical Reports**

1. The accounting department is responsible for preparing, reviewing and analyzing the statistical reports for overall reasonableness of hold percentages. Table games information may be combined on one report as long as the information for each game is presented separately. This report provides a statistical analysis of table game hold percentages by table, by shift, and total by game type on a current month basis. The hold percentage is calculated by dividing AGP by the drop. Interview accounting personnel to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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2. The licensee must produce system generated reports supporting tickets issued, tickets redeemed, cashable electronic promotional credits and non-cashable electronic promotional credits for each table game.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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3. The current month total by game type hold percentage is compared to an expected hold, generally the licensee's historical hold percentage (as defined in the licensee's Written Accounting Plan) by game type. If an historical hold is not available, for example a new table is added to the floor, an expected hold percentage should be determined. This could be the industry standard or expected hold provided by the game distributor. Documentation for the determination of a licensee's expected hold, i.e. what time period was used for a historical hold or how an industry standard was determined for new games, including the impact of side bets or bonusing, if applicable, must be detailed in the Written Accounting Plan. Interview accounting personnel to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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4. Fluctuations, by game type, of equal to or greater than  $\pm 5\%$  from the expected hold percentage must be reviewed, investigated and documented in accordance with the adequate explanation criteria described earlier in this section under "General". Interview accounting personnel to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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5. A notation must be made on the report by the respective table indicating the type of game played (e.g., single deck, multi deck, multi-action, Let It Ride, etc.). Interview accounting personnel to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**ICMP – ACCOUNTING – C. SLOT MACHINES**

**Hopper Adjustments**

1. The initial hopper load is not deductible for gaming tax purposes. The difference between the initial hopper load and the total amount that is in the hopper at the time the hopper is counted must be included as either an addition to, or subtraction from, revenues when calculating AGP. This amount is reported on the monthly gaming tax return for the month in which the hopper count was conducted, and is reflected in the hopper adjustment column for the corresponding denomination.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Interview accounting personnel to determine their understanding of this procedure. Were the forms properly completed and reconciled?

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2. Proper support and documentation of all hopper adjustments must be maintained. Hopper adjustments must be made when any of the following occurs:

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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- The denomination is changed for a machine,
- The machine's ticket functionality is activated,
- A machine is moved from one establishment to another establishment,
- A change in ownership occurs (i.e., when a new license is issued),
- When a business closes, or
- When the machine is removed from the floor.

If a hopper count is performed for other purposes than described above, the same amount counted in the hopper must be returned to the hopper. Interview accounting personnel to determine their understanding of this procedure.

3. The cashier must sign the hopper summary report for all hopper contents receipted into the cashier cage. A jet coin sorter or other count/weigh device may be used on the gaming floor to facilitate the hopper count. Any count/weigh device used to count the hopper contents must be tested and the test must be documented and signed by the cashier on the hopper summary report. Interview accounting personnel to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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4. All hopper adjustments are recorded in the hopper adjustment column of the monthly gaming tax return for the month in which the hopper contents were counted. If a hopper drop and count is performed at the same time a regular drop and count is conducted, the licensee must not commingle hopper and drop bucket funds. Funds, as well as corresponding accountability, must remain separate. Sample the last hopper adjustment to ensure proper paperwork was completed; the adjustment was properly calculated and properly reported on the tax return.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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5. When performing a hopper count, the drop and count team requirements are the same as for any slot machine drop and count. Refer to corresponding slot machine drop and count procedures in the Table Games and Slot Drop and Count section of the ICMP. A hopper adjustment must be conducted for each event outlined in the ICMP. Interview accounting and slot personnel to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**Gambling Payment Intercept (GPI)** – Refer to ICO Checklist Section 1 General, H.

**Slot Procedures**

Accounting personnel perform the procedures detailed below and sign gaming forms where appropriate, as evidence that accounting procedures have been performed.

1. Accounting reviews, matches, and verifies all copies of the jackpot payout/fill slips used since the previous drop. Accounting also verifies the sequence of the slip numbers from shift-to-shift, determines that no slips are missing or unaccounted for, and examines the slips for proper signatory authority, mathematical accuracy, and proper completion in accordance with

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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the ICMP. If a payout request form was completed, which allows patrons to continue playing credits not associated with the jackpot prior to payment, the form must also be reviewed to ensure proper completion and that required criteria is met (e.g., payout was less than \$5,000, payout was not an override, etc.) Interview accounting personnel to determine their understanding of this procedure. Select a sample of slips to determine if they are properly completed.

2. Licensees with approved gaming systems can perform the following alternative procedures in lieu of matching all copies of the jackpot payout/fill slips:

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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- a. Accounting sums the dollar value of all white copies of the jackpot payout/fill slips, the yellow copies of the jackpot payout/fill slips and compares the totals to the system generated report for the same time period. At a minimum, this is performed in conjunction with reconciling each drop period. If there is a difference between the dollar amounts, all slips must be matched and verified.
- b. Accounting must review all of the slips to ensure proper signatory authority and proper completion in accordance with the ICMP.

Interview accounting personnel to determine their understanding of these procedures. Select a sample of slips to determine if they are properly completed.

3. The owner/operator or the controller/auditor ensures any missing jackpot payout/fill slips are investigated and explained. A report is then produced explaining the cause of, and the responsibility for, the loss. Interview accounting personnel to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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4. Accounting reviews, matches, and verifies the original (white) and copy (pink) of all unclaimed jackpot receipts, matches the unclaimed jackpot receipts to the corresponding jackpot payout/fill slips, verifies the sequence of the receipts' numbers to determine that no receipts are missing or unaccounted for, examines the receipts for proper signatory authority, and proper completion in accordance with the ICMP. Interview accounting personnel to determine their understanding of this procedure. Select a sample of forms to determine if they are properly completed.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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5. Noncompliance issues are investigated, resolved, and documented on a timely basis. Payout slips should be reviewed to ensure that if a verifier is not used that required criteria is met when completing the slip (e.g., payout was less than \$1,200, payout was not an override, no verifier was warranted, etc.). If noncompliance issues are noted as a result of reviewing payout slips that do not involve a verifier, accounting should notify surveillance immediately for additional review. Interview accounting personnel to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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6. The Slot Summary Report, Weigh/Wrap Variance Report, and Bill Validator Summary Report are reviewed to verify that:

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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- a. The count/weigh machine(s) (e.g., weigh scale, currency counter, etc.) have been properly tested by count team members.
- b. All team members have signed the reports and examine them for proper signatory authority (rotation of team and independence).
- c. The reports are completed properly in accordance with the ICMP.
- d. The reports are mathematically correct.
- e. The cashier signed the reports as evidence of receipt of the drop proceeds into the cage.
- f. The total count on the Slot Summary Report agrees to the Weigh/Wrap Variance Report, and the total count on the Slot Summary Report and the Bill Validator Summary Report agree to the count recorded on the Daily Cash Summary.
- g. Accounting signs the reports to document their review procedures and investigates any differences, variances, and noncompliance issues resulting from their review process. All investigations and results of the investigations must be documented.
- h. The Weigh/Wrap Variance Report is also reviewed for large and/or unusual variances, proper completion, mathematical accuracy, and signatory authority. Variances of 1% or more, by denomination or in total, are investigated and documented on this form.

Interview your accounting personnel to determine their understanding of these procedures. Test the Slot Summary Report, weigh scale tape, Weigh/Wrap Variance Report, Bill Validator Summary Report, currency counter tape, and Daily Cash Summary with the attribute worksheets.

**Payouts of less than \$1 on tokenized machines**

1. Licensees may use a tokenized credit payout slip for payouts of \$0.99 or less on tokenized machines. Licensees that utilize an automated gaming system to generate jackpot payout slips may continue to use the system-generated slip and process the payout in accordance with the payout procedures in the Slot section of the ICMP. The exception is that licensees do not need a verifier involved to verify the payout, verify the meters, or to sign the slip. Interview accounting personnel to determine their understanding of this procedure.
2. In order to deduct these payouts, accounting must monitor and track the payouts throughout the month, reconciling to the jackpot meters. If the licensee utilizes an approved gaming system, accounting must update the system for the payouts for each individual machine. Accounting will investigate and document all variances exceeding established thresholds, on a monthly basis, at a minimum. Only tokenized payout slips that are paid, reconciled to the jackpot report and entered into the automated system (if applicable) are deductible for gaming tax purposes. Interview accounting personnel to determine their understanding of this procedure.
3. Credits of \$0.99 or less on tokenized machines that have been abandoned may be keyed off the machine. The slot personnel must log these amounts on the slot access card in order to track these keyed off amounts. Interview accounting and slot personnel to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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4. Alternatively, in lieu of monitoring and tracking these payouts, licensees may treat these payouts as promotional expenses and, as such, may not deduct them from AGP. It is important to understand that, even if the payouts are treated as promotional expenses, the Jackpot Comparison Reports remain subject to the current investigation criteria required by the ICMP. Interview accounting personnel to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**Slot Tournament Procedures**

1. Once the slot tournament forms are received by accounting, the accuracy of the forms is verified. The total amount collected, by shift and day, for the tournament is recorded on a Slot Tournament Summary form and the grand total collected is calculated. The slot tournament summary form is filled out only by the accounting department. Interview accounting personnel to determine their understanding of this procedure. Review the forms for the last tournament to determine if it is properly completed.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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2. The total amount awarded in prizes is documented on the summary sheet. AGP is calculated using the following formula:

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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- The total amount collected as entry fees including the dollar value of complimentary (comped) and non-cash entry fee *minus* the total amount awarded in prizes *equals* AGP.

Interview your accounting personnel to determine their understanding of this procedure. Review the forms to determine if they are properly completed. Was AGP properly calculated?

3. If awarded prizes are merchandise, the amount deductible is the actual cost of the merchandise, not the market value. Proper documentation must be maintained to support the cost of the merchandise, such as invoices. Merchandise given to patrons for entering the tournament is not considered a prize; therefore, the cost of the merchandise is not included in the calculation of AGP for the slot tournament. Interview accounting personnel to determine their understanding of this procedure. Review the forms to determine if they are properly completed.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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4. AGP from slot tournaments are included on the monthly gaming tax return for the month in which the tournament ended. Interview accounting personnel to determine their understanding of this procedure. Review the forms to determine if they are properly completed.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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5. If the actual cost of all prizes awarded exceeds the amount received in tournament entry fees, the licensee may not declare a loss against AGP. Interview accounting personnel to determine their understanding of this procedure. Review the forms to determine if they are properly completed.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**Progressive Procedures**

Pursuant to CLGR 30-1244(3), licensees must establish control procedures that can explain and/or reconcile any increase, reduction or discontinuance of all progressive jackpots offered for patron play. For reconciliation purposes, only attendant paid progressive jackpot amounts (excluding WAP progressive jackpots) must have supporting documentation. Licensees with an approved gaming system may utilize system jackpot reports to explain decreases in liability.

1. Ensure the licensee has established control procedures to explain fluctuations in amounts for all progressive jackpots offered for patron play.
2. If your establishment allows attendants to pay certain progressive jackpot amounts, interview the attendants to determine their understanding of the licensee's process for documenting such fluctuations.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**Commemorative Coin Machines**

1. Licensees may have commemorative coin machines in their casino. Licensees purchase the commemorative coins at one value and redeem the coins from patrons at another value. Throughout the gaming year, the commemorative coins must be recorded by the licensee at their redemption value. Interview cage and accounting personnel to determine their understanding of this procedure.
2. An adjustment must be made on the last tax return of the gaming year to adjust for the difference between the redemption value and purchase cost of the commemorative coins. This adjustment will be based on the total amount of commemorative coins purchased during the gaming year, net of the cost of any coins sold back to the manufacturer (if applicable). Interview accounting personnel to determine their understanding of this procedure. Review the paperwork to determine the proper calculation was done.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**Slot Machine Meters**

1. On drop days, before gaming commences on the slot machine being dropped, slot machine meter readings are captured in order to prepare the required reports. For licensees who have successfully tested their gaming system and submitted the Acknowledgment Letter, or who have received written approval from the Division for the use of their gaming system, the meters are captured by the system. For licensees who do not have a gaming system or have not successfully tested their system and submitted the Acknowledgment Letter, an independent licensed employee records the slot machine soft meters. Interview accounting personnel to determine if all the required meters are captured as required per the ICMP. If system meters are used to prepare the statistical reports, has the licensee met the requirement to rely on system meters per the ICMP?
2. The drop team must not have access to the meter readings. The person reading and recording the meters may not participate on the drop or count team. An individual participating in some form of slot activity, such as participating in a jackpot payout or fill would not be considered independent. However, the meters may be read by a security

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**ICMP Compliance Checklist: Section 11, ACCOUNTING**  
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person, as long as they have only acted as a verifier on a jackpot/fill payout during the drop period and do not participate as a drop (e.g., observer) or count team member that same day. Interview your drop team and accounting personnel to determine their understanding of this procedure.

NOTE: Test manually recorded meters on the meter reading attribute worksheet and ensure proper meters were captured and used for preparation of statistical reports.

3. Manually recorded soft meter readings and system captured meters must be reviewed by accounting for reasonableness using pre-established parameters and prior meter readings. Prior to final preparation of statistical reports, meter readings which appear unreasonable are reviewed with the slot department personnel so that meters can be repaired or clerical errors in the recording of meter readings can be corrected. Interview your accounting personnel to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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4. Manually recorded soft meter readings and system captured meters may not be altered except to correct meters that were incorrectly recorded or captured. All changes or adjustments must have adequate supporting documentation. At no time can a meter delta be changed or adjusted without a thoroughly documented investigation. Accounting is responsible for notifying the slot department of potentially faulty meters and following up to ensure that proper maintenance is performed. Documentation must be maintained which supports machine service and maintenance. Interview your slot and accounting personnel to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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5. It is the licensee's responsibility to capture meter readings so that the accurate statistical reports can be generated. If meters zero out (i.e., reset or clear), accounting personnel must contact the slot department to determine the cause of the meter reset. CLGR 30-1223 requires that licensees must maintain adequate records when electronic (soft) meter(s) are cleared. Using the information provided by the slot department, accounting personnel or the slot department must complete the meter reset form whenever meters are reset or cleared. On a monthly basis, accounting personnel must review the meter reset form to determine if there are any on-going problems with one or more slot machines, or similar or consistent problems with certain types of machines. If a machine's meters were reset or cleared three or more times a month, accounting and slot personnel must determine the cause of these resets. Accounting must document these reasons for future review by the Division. The Division must be notified via email at [dor\\_coloradocasinos@state.co.us](mailto:dor_coloradocasinos@state.co.us) if a machine's meters reset three or more times in a month excluding RAM clears performed on new installations and final drops where final meter readings have been recorded. It is accounting's responsibility to ensure that appropriate and adequate meter readings are available to generate statistical reports.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Interview slot and accounting personnel to determine their understanding of this procedure. Review the meter reset log to determine compliance with this procedure.

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6. All applicable soft or system meter information must be captured for each drop. For example, Voucher In and Voucher Out do not need to be recorded for a non-ticketing machine. Meters are recorded for each machine on the gaming floor, including machines out of service. If meters cannot be recorded for machines out of service at the time of the drop, meters must be recorded prior to placing the machine in service. Interview slot and accounting personnel to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**Slot Machine Statistical Reports**

See individual statistical report checklists later on in this checklist.

1. The one slot summary report which accounting must prepare, review, and analyze is: the Monthly Slot Revenue Summary (MSRS). The one reconciliation report which accounting must prepare, review, and analyze is the Tax Template. A fills reasonableness analysis, which is an optional report, may be prepared by the licensee to identify excessive fills. A timely review of statistical reports is crucial to maintaining a secure internal control environment. Licensees are responsible for monitoring the performance of all gaming devices so that problems can be identified and resolved on a timely basis. Unusual, large, and/or unexpected variances must be investigated by the appropriate personnel, and the results documented in accordance with the adequate explanation criteria described earlier in this section under "General." Interview accounting personnel to determine their understanding of this procedure. Is accounting preparing, reviewing, and analyzing these reports adequately?

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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2. Machine activity for any and all machines that were active on the gaming floor for any part of the month or year must be reflected on all slot statistical reports. Interview accounting personnel to determine their understanding of this procedure. Review the reports to determine compliance with this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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3. It is not acceptable to arbitrarily alter meter or actual information on any statistical report. Meter and actual information on any statistical report can only be changed if meters were read, recorded or captured incorrectly or if a data entry error occurred. All changes must be supported with adequate documentation. Review the last five adjustments made to statistical reports to determine if there is proper documentation and the adjustments received a secondary level of review. Document the five adjustments reviewed and test results. (Who makes the changes when they are made? Is a report printed for these changes/adjustments? Who reviews the changes for validity?) Interview accounting personnel to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**Tax Template**

1. The Tax Template is a tool used to reconcile a licensee's statistical reports, monthly gaming tax return, general ledger, and to identify any variances among them. The Tax Template must be completed by the licensee each month prior to submission of the monthly gaming tax return. The reconciliation must be signed and dated by the person performing the reconciliation. A secondary level review of the reconciliation must be performed. This review must be evidenced on the Tax Template by the reviewer's initials and date of the

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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review. Any resulting variances must be explained and documented in accordance with the adequate explanation criteria described earlier in this section under "General." The current Tax Template spreadsheet is available on the Division's website. The licensee must use the most recent Tax Template for their reconciliation. Ensure the Tax Template being utilized is the most recent template on the Division's website. Interview accounting personnel to determine their understanding of this procedure.

- The licensee must ensure the statistical reports trace to all corresponding reports and reconcile to the tax return. All variances by denomination must be adequately documented and explained. Any necessary adjustments are made to the report and reviewed prior to the filing of the gaming tax return. All adjustments made to the reports must be documented and supported by an adequate audit trail. Ensure the tax template has been completed for each month for the period of review (e.g., six months). Ensure variances reflected on the tax template were investigated with the results documented in writing. Interview accounting personnel to determine their understanding of this procedure. Ensure all amounts on the tax template agree to the respective statistical reports, General Ledger and tax return. Was the tax template completed prior to submission of the monthly gaming tax return?

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**Jackpot Comparison Report (Jackpot Report)**

- Payouts that are not a result of a wager cannot be included in the calculation of AGP; therefore, are not allowable deductions on the gaming tax return. Examples of payouts that are not allowable deductions on the gaming tax return include the following: amount of overpayment of jackpots, payments due to incorrect machine set up, (i.e., reel strips incorrectly installed showing a jackpot yet the machine meter does not support the jackpot), failing to perform slot machine maintenance, payments as a result of a patron dispute that is not supported by the Division's resolution, etc. These types of payouts are considered promotional and may not be included as deductions on the gaming tax return. These types of payments must be shown as reconciling items on the MSRS and the Tax Template. Review the last Tax Template and Tax Return to ensure these types of transactions are properly backed out and not included in the calculation of AGP.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**ICMP – ACCOUNTING – D. CASHIER**

**Cashier Procedures**

Accounting personnel perform the procedures outlined below and sign gaming forms where appropriate as evidence that the procedures have been performed.

- Accounting clerically tests beginning and end of shift cash inventory sheets and trace totals to the Daily Cash Summary (DCS). Interview accounting personnel to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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2. Accounting reviews the supporting documentation for all cash receipts and cash disbursements and verifies that all transactions are properly supported and authorized. Interview accounting personnel to determine their understanding of this procedure.
 

C	N	2C	2N
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3. Promotional coupons and slot coupons, accepted by a cashier, in a kiosk or via a pouch pay are not deductible in the calculation of AGP. Interview accounting personnel to determine their understanding of this procedure. Review the treatment of coupons to determine compliance with this procedure.
 

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4. Accounting recalculates the net cash increase or decrease on the DCS and posts to the General Ledger. Interview accounting personnel to determine their understanding of this procedure.
 

C	N	2C	2N
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5. Accounting traces amounts on the DCS to the Master Games Sheet, Slot Summary Report, Bill Validator Summary, and Weigh/Wrap Variance Report and investigates and documents any discrepancies. Interview accounting personnel to determine their understanding of this procedure.
 

C	N	2C	2N
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6. On a periodic basis, frequent enough to detect unusual transactions on a timely basis, but at least once each drop period, accounting must have procedures in place whereby the copies of the jackpot payout/fill slips, table games jackpot payout slips, and the Fill/Credit slips are obtained and reconciled. Totals from the slips must also be reconciled to the DCS and/or the drop paperwork, as applicable. If discrepancies are discovered, accounting must investigate and document any discrepancies. Interview accounting personnel to determine their understanding of this procedure.
 

C	N	2C	2N
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7. All sequentially numbered gaming forms are accounted for by accounting personnel. The owner/operator or the controller/auditor investigates any missing slips. Such investigation is documented in a report, which is submitted to the manager/owner, or owner's designee, for action, as appropriate. Noncompliance issues are investigated, documented, and resolved on a timely basis. Accounting reviews all forms for mathematical accuracy and proper completion in accordance with the ICMP. Interview accounting personnel to determine their understanding of this procedure.
 

C	N	2C	2N
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8. All completed gaming documents are forwarded to accounting. Accounting must review these documents for reasonableness, mathematical accuracy, proper signatory authority, and proper completion in accordance with ICMP. Interview accounting personnel to determine their understanding of this procedure.
 

C	N	2C	2N
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9. On at least a quarterly basis, accounting personnel must randomly verify the amount of coin contained within coin bags. This function may take place any time during the calendar quarter. This unannounced test must be performed for a minimum sample of two bags of coin or tokens for each denomination, for each location that bags are stored (e.g., cashier cage, coin room, vault, etc.). The date of the quarterly verification is randomly selected by
 

C	N	2C	2N
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accounting personnel and must occur on different dates and days each quarter so as to preclude any predictability of when the verification will occur. The test must be documented on the bagged coin/token verification form. If the difference exceeds \$10, the licensee must investigate and document the reason for the variance. If the difference exceeds \$50, the Division must be contacted for evaluation of the test results and determination of further action needed. Interview accounting personnel to determine their understanding of this procedure. Review the last quarterly test to determine compliance with this procedure. Document the date of the last quarterly test and results.

**ICMP – ACCOUNTING – E. KEY CONTROL**

1. Accounting is responsible for reviewing the completed key logs for restricted key boxes. The key logs, with the exception of the Duplicate Key Control Log, are forwarded to accounting once a page is completed, but at least monthly. The Duplicate Key Control Log should be forwarded to accounting once a page is completed but at least annually. Upon receipt of the logs, accounting personnel review the key logs to ensure the logs are properly completed. Interview accounting personnel to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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2. Accounting personnel review the key logs to ensure:

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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- a. Only authorized individuals accessed restricted keys.
- b. Length of key check out is appropriate for the function being performed.
- c. All keys were properly and timely returned.
- d. All noncompliance items are addressed based on procedures outlined in the Written Accounting Plan.
- e. Accounting's review must be evidenced by the reviewer's initials and date of review.

Review the most recent key control logs to determine compliance with this procedure. Interview your accounting personnel to determine their understanding of this procedure.

3. If the licensee utilizes an automated key tracking system (AKTS), the reports provided by the system will substitute for the key logs in a manual process. Accounting personnel perform a review of reports generated by the AKTS that document key transactions. This review is performed on a timely basis (as defined in the Written Accounting Plan) to ensure all restricted keys are returned within a reasonable amount of time pursuant to the completion of the task that created the need for the key(s) removal, and any unusual key removals are investigated and key returns have occurred. This review is evidenced by the reviewer's initials and date of review. Interview your accounting personnel to determine their understanding of this procedure. Review the most recent key control logs to determine compliance with this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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4. Investigations must be performed for any missing restricted keys. The investigation results must be documented. All improper transactions or unusual occurrences are investigated with the results documented. The Division is notified of unusual key activity including missing restricted keys, restricted keys taken off property, and system failures that require the AKTS to be manually accessed, etc. Interview your accounting personnel to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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5. Accounting personnel perform a review of reports generated by the AKTS that document transactions performed by system administrators. This review is performed on a timely basis (as defined in the Written Accounting Plan) to determine whether the transactions completed by the system administrators provide adequate control over access to restricted gaming keys. This review is to determine whether the system administrator's transactions were proper, reasonable, and authorized. Documentation forwarded to accounting, which identifies the system administrator (name and license number) accessing the keys, security observing the access, the date and time of access and the reason for access is compared to the system report that details the administrator's access. This review is evidenced by the reviewer's initials and date of review. Interview your accounting personnel to determine their understanding of this procedure. Review the reports to determine if there is adequate documentation.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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6. Any time persons are added to or removed from the system, accounting personnel compares the key authorization logs or signature cards to the system information to ensure that key access within the system is appropriate. Interview your accounting personnel to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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7. Any time inappropriate access is discovered or suspected, the surveillance coverage of the AKTS, and any related areas, must be reviewed. This surveillance coverage must be maintained until such time there is a resolution to the investigation. Interview your accounting personnel to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**ICMP – ACCOUNTING – F. FORMS CONTROL**

1. Accounting is responsible for completing and maintaining the forms control log. This log is completed each time forms are received by the licensee from the printer and when forms are distributed to the various departments. A separate forms control log must be maintained for each type of sequentially numbered form issued by accounting. The accounting person issuing the forms and the person receiving the forms sign the forms control log. Only one sequence of each type of form may be issued and used for each locked dispensing machine, at one time. Interview accounting personnel to determine their understanding of this procedure. Review the forms control logs to determine if they reflect all the required information per ICMP.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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2. As needed, accounting personnel replenishes forms in the locked dispensing machines. During the week, casino personnel (e.g., cage employees, top signers, etc.) must notify accounting, before the Accounting Department closes, if they are running low on a particular form. To

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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prevent the licensee from running out of a form while the accounting office is closed (e.g., holidays, weekends, etc.), accounting may issue one series of forms to the gaming manager prior to the he accounting office closing. These forms must be locked in the surveillance room or other secure area. If the Accounting Department is closed, the gaming manager may replenish forms in the locked dispensing machines using the extra series of forms. However, during accounting's regular business hours, forms must be checked out by accounting using the forms control log. Accounting is responsible for reconciling the numerical sequence of all forms. Accounting must ensure it knows, at all times, what series of forms have been issued to the gaming manager to be locked in the surveillance room or other secure area. Alternatively, for emergency purposes only, the general manager or designee, escorted by security, may access the accounting office to obtain forms. Are forms secure? Who has access to forms? Interview accounting personnel to determine their understanding of this procedure.

3. If the Accounting Department is not physically located in the same building as the casino, one set of the forms can be maintained in the casino, under lock and key, with access to the forms limited to the gaming manager or security. Logs are maintained for these forms indicating receipt from the accounting office, issuance to the respective gaming department, dates, form numbers and signatures of the individuals receiving and issuing the forms. Interview accounting personnel to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**ICMP – ACCOUNTING – H. KIOSK PROCEDURES**

Accounting personnel perform the procedures detailed below and sign gaming forms, where appropriate, as evidence that the accounting procedures have been performed.

1. Match both copies of the kiosk disbursement form and examine the slips for proper signatory authority.
2. Trace information contained on the kiosk disbursement form to the kiosk fill report.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Select sample dates and ensure the above steps were completed. Interview your accounting personnel to determine their understanding of this procedure.

3. At the completion of the kiosk stacker drop/count, accounting personnel must perform the following procedures:

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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- a. Print a ticket report from the ticketing module of the gaming system that reflects the dollar value of each ticket or coupon redeemed by each kiosk.
- b. Trace the total dollar amount of tickets or coupons obtained from the count to the reports from the ticketing module of the gaming system. Any discrepancies must be investigated and the results of the investigation documented.
- c. Trace the total dollar amount of tickets or coupons and currency from the count paperwork to the kiosk report (forwarded to accounting at the time of the kiosk drop) that details the stacker contents. Any discrepancies must be investigated and the results of the investigation documented.

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- d. The total dollar amount of tickets or coupons on the reports from the ticketing module of the gaming system should trace to the ticket amount on the kiosk report. Any discrepancies must be investigated and the results of the investigation documented.

Select sample dates and ensure the above steps were completed. Interview your accounting personnel to determine their understanding of this procedure.

4. Accounting must perform the following procedures each time the kiosk cassettes and hoppers are counted. At a minimum, cassettes and hoppers are counted and reimpresed once each month.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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- Reconciliation must be prepared and documented at the completion of the cassette and hopper count.
- Kiosk reports are used to reconcile the beginning imprest amount minus coins and bills disbursed to equal the funds remaining in the cassettes and hoppers.
- The dollar amount of the cassettes and hoppers recorded on the count paperwork must equal the funds remaining in the cassettes and hoppers as recorded on the reconciliation.
- The reconciliation must be signed and dated by the person performing the reconciliation.
- A secondary level of review must be performed of the reconciliation.
- Any discrepancies must be investigated and the results of the investigation documented; discrepancies could be the result of dispense errors, kiosk receipt issuance, or theft. Adequate explanation criteria must include the procedures used to investigate the variance and the results of the investigation.

Select sample dates and ensure the above steps were completed.

**ICMP – ACCOUNTING – I. WIRELESS PROCEDURES**

1. Accounting personnel perform the procedures detailed below for each validation device. Sign and date essential gaming forms where appropriate, as evidence that required accounting procedures have been performed.

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- Accounting reviews, matches, and verifies the tickets and slot coupons redeemed from each validation device to the device's corresponding report that lists every ticket and slot coupon redeemed by that device.
- The tickets and slot coupons validated, redeemed and paid through the use of the validation device are processed and handled the same as tickets or slot coupons that are redeemed from the cashier cage. The tickets redeemed by cashier report produced for each validation device is reviewed. The total dollar value of tickets recorded on the daily cash summaries is compared to the tickets redeemed by cashier report produced by the cashier that details the ticket or slot coupon transactions.

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- c. All variances between the total of the day's tickets or slot coupons and the report(s) are investigated and documented in accordance with the adequate explanation criteria.
- d. The Written Accounting Plan must include the reconciliation of all tickets redeemed through the use of a handheld device and the inclusion of these tickets on the applicable supporting and statistical reports.

Select sample dates and ensure the above steps were completed. Interview your accounting personnel to determine their understanding of this procedure.

NOTE: Attached to the Accounting section compliance checklist are attribute worksheets to assist in documenting detailed compliance testing of gaming transactions. These worksheets must be completed; the attribute worksheets are not optional. Please refer to the general instructions for guidance on the scope and sample size for your detailed compliance testing of gaming transactions.

**ICMP – ACCOUNTING – J. MINIMUM BANKROLL REQUIREMENTS**

1. The minimum bankroll analysis worksheet is an analysis of a licensee's cash position. It is used for compliance purposes to determine if the licensee has sufficient funds to meet gaming requirements and meet governmental obligations. An example of this worksheet and its instructions are located on the Division's website. Determine if the licensee has completed a current minimum bankroll requirements worksheet. Verify the figures contained on the worksheet to supporting documentation. Is the worksheet properly completed? Verify the most recent version of the worksheet (available on the Division's website) was used. If there is a deficiency, did the casino notify the Division? Interview accounting personnel to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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2. A minimum bankroll analysis worksheet must be prepared by each licensed entity on a basis as frequent as necessary to determine whether a cash deficiency exists. Each licensed entity is required to submit this worksheet to the Division's Audit section:

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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- a. Prior to opening, each month for the first three months subsequent to opening and, if released from the monthly requirement by the Division, quarterly thereafter until the first anniversary of the opening,
- b. Upon request by the Division,
- c. Upon adding or removing devices which materially affect the licensee's cash requirements,
- d. When the licensee's cash position materially changes, and
- e. When there is a cash deficiency.
- f. Interview your accounting personnel to determine their understanding of this procedure.

3. If, at any time, the licensee's available cash or cash equivalents are less than the amount required, the licensee must immediately notify the Division of this deficiency. Upon review of

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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the bankroll analysis by the Division, the Director may require an adjustment to the cash requirement. The calculated cash requirement does not necessarily mean that the licensee must maintain this entire balance on premises. In other words, the cash requirement may be maintained either on premises, or in a bank account, or both. However, the licensee must be able to draw upon the funds immediately. Interview your accounting personnel to determine their understanding of this procedure.

4. The total chip and token liability (float) is included on this worksheet. The liability is calculated by taking the total of all chips, excluding non-cashable chips, and tokens manufactured as indicated on invoices, minus all chips and tokens available in the casino or destroyed. Interview accounting personnel to determine their understanding of when the worksheet is completed and submitted to the Division.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**ICMP – ACCOUNTING – K. MONTHLY GAMING TAX RETURN**

1. Each licensee must file a monthly gaming tax return electronically. The gaming tax return is due the 15<sup>th</sup> day of the month immediately following the calendar month for which taxes are due. If the 15<sup>th</sup> falls on a weekend or holiday, the tax return is due the following business day. If a tax return is not filed timely, a penalty equal of 15% of the tax or \$10, whichever is greater, will be assessed in accordance with section 3044-30-604, CRS. Interview accounting personnel to determine their understanding of when the Tax Return is to be completed and submitted to the Division. Review a recent return to determine timely submission.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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2. Payment of gaming tax is made using Electronic Funds Transfer (EFT). Pursuant to section 44-30-604 CRS, if the gaming tax is not paid within the prescribed time, interest will be assessed at a rate of 2% per month for the period of time during which the payment is late, or \$5, whichever is greater. Interview accounting personnel to determine their understanding of this requirement.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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3. Any adjustments to previous months' AGP must be reported as an adjustment on the gaming tax return, providing this falls within the same gaming tax year. Prior to submitting the tax return affected by the adjustment, the licensee MUST submit supporting documentation to the tax examiner. If the adjustment reflects previously unreported revenue, the licensee must also pay interest on the adjustment. If the adjustment is for a period prior to the current tax year, the licensee must contact the Division's Audit section for proper reporting requirements. Contact the Division for calculating the amount of any interest due and for reporting procedures for any adjustment falling in another gaming tax year. Interview accounting personnel to determine their understanding of this requirement.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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4. The number of devices (slot machines or table games) reported on the tax return is based on the average number of active devices on the floor during the month. To arrive at this figure, total the number of devices per day for the month and divide that total by the number of days in the month. Interview accounting personnel to determine their

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understanding of this procedure. Review a recent return and recalculate the number of devices.

5. Licensees may report slot drop on the tax return using either weigh or wrap amounts, but must be consistent with whichever basis is used. Weigh/wrap variances are not reported on the tax return. Interview accounting personnel to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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6. If monthly reporting can be properly configured in the gaming system, a drop does not need to be scheduled for the last day of the month; the revenue (drop) and expenses (jackpot and fills) from the drop closest to the end of the month is used for filing that month's return. The revenue and expenses generated for the remainder of the month is reported on the next monthly gaming tax return. Interview accounting personnel to determine their understanding of this procedure.

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7. In order for the AGP from charitable events to be taxed at the charity tax rate (3%), the licensee must file the appropriate notice with the Golden office of the Division of Gaming, to the attention of the Audit Section, at least 14 days prior to the day of the event. Otherwise, the AGP collected for that event will be taxed at the normal tax rate. An example of the notification form may be obtained from the Division upon request. Interview accounting personnel to determine their understanding of this procedure.

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**Unclaimed Jackpots**

1. Unclaimed jackpots and unredeemed tickets may not be deducted for gaming tax purposes until they are actually paid to the patron. The licensee must have procedures in place to:
- Track unclaimed jackpot receipts and related jackpot slips upon issuance,
  - Track which slips are still outstanding, and
  - Track which slips are paid.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Interview your accounting personnel to determine their understanding of this procedure.

2. The licensee must have a policy in place for paying patrons if the paperwork has been dropped to accounting. In some cases, the patron may not have retained their copy of the unclaimed jackpot receipt. Upon establishing proper identification of the patron and verifying whether the taxable jackpot winner is listed in the GPI registry as detailed in ICMP Section 1 General, H, the award is paid and a note is made on the licensee's copy of the unclaimed jackpot receipt that the patron's copy is not available. Interview accounting personnel to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**ICMP – ACCOUNTING – L. STANDARD FINANCIAL STATEMENTS**

1. Each year licensees are required to file standard financial statements with the Division. Standard financial statements for the calendar year (January – December) are due to the Division by March 15<sup>th</sup>. Any questions regarding how the statements are to be completed are directed to the Division's Audit section. All schedules must be completed. If there is a

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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schedule that does not apply to the licensee, then all amounts must be entered as zero. All information is kept confidential; the financial information is compiled on a city, state-wide, and tax tier group basis and presented in the annual Gaming Fact Book and Abstract. Interview accounting personnel to determine their understanding of this procedure.

2. Un-audited financial statements must also be submitted to the Division in the event any of the following occur:

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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- A license termination,
- Change in the business entity, or
- A change in control or ownership.

If any of the above events occur, the licensee or former licensee must, no later than 75 days after the event, submit to the Division a financial statement covering the period from the last statement to the date of termination or change. Contact the Division's Audit section prior to submitting the financial statements. Interview your accounting personnel to determine their understanding of this procedure.

**ICMP – ACCOUNTING – M. AUDITED FINANCIAL STATEMENTS**

1. Pursuant to CLGR 30-1620, licensees with AGP during their business year of \$10 million or more must submit two printed copies or one electronic copy, of their audited financial statements for that business year to the Division not later than 120 days after the last day of the licensee's business year. Determine if the licensee's AGP for the business year is \$10 million or more. Ensure a copy(s) of their audited financial statements were submitted to the Division not later than 120 days after the last day of the licensee's business year. Note the date the financial statements were submitted.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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2. Within 10 days of the licensee initially engaging an independent certified public accounting firm or a new firm to perform their audit, the licensee must notify the Division's Tax Examiner in writing of the name of the firm. Prior to the firm's review, the licensee must notify the Division's Tax Examiner of the names of the individuals performing the review, which requires access to restricted areas, what restricted areas they will access, and the date of access. Interview accounting personnel to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**ICMP – ACCOUNTING – N. INTERNAL COMPLIANCE OFFICER**

1. Each licensee must designate, in writing, to the Division's Audit section, an employee that will serve as its internal compliance officer (ICO)<sup>1</sup>. The ICO can be an employee of the licensee or a contracted licensed person. The licensee must include a description of the designee's primary job responsibilities, line/staff authority, the position the ICO reports to, related gaming experience, gaming license number, and email address. The ICO(s) must possess a key license unless a property-level ICO reports to a key-licensed corporate

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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<sup>1</sup> Group A

Difference ↑ This doesn't apply to Group A Licensees. Group A Licensees are exempt from the requirement to have a designated ICO.

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position responsible for compliance or the ICO's responsibility is limited to the completion of the semi-annual ICO checklist. Prior to opening and within 30 days of any change in the designated ICO, all licensees must submit a letter to the Division's Audit section designating their ICO(s), the ICO(s) e-mail address and other required information. The ICO can be an employee of the licensee or a contracted licensed person. The licensee must include a description of the designee's primary job responsibilities, line/staff authority, the position the ICO reports to, related gaming experience, gaming license number, and email address. Generally, the ICO(s) must possess a key license. The following guidelines should be considered in appointing an ICO:

- a. Objectivity - The objectivity of the ICO is determined by the organizational level to which the ICO reports the results of their work and the organizational level to which they report administratively. The ability of the ICO to act independently of the individuals responsible for the functions being audited or reviewed is crucial.
- b. Competence - The competence of the ICO is determined by their relative work experience in the area they are reviewing, and training and supervision received. To effectively evaluate systems of internal control, operating processes, and other management requests, the ICO must be familiar with the internal control objectives and operating procedures for the specific area of operations they are reviewing.

It may be necessary for licensees to designate more than one ICO in order to meet both the objectivity and competence requirements for all sections. The appointment of this ICO(s) is subject to review by the Division's Audit section.

2. At a minimum, the ICO must complete one full set of the ICMP Compliance Checklist for Internal Compliance Officers every six months. Copies of the checklist may be obtained at the Division's website at <https://sbg.colorado.gov/ico-information-gaming>. Determine if the most recent version of the ICO checklist is being used.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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3. The ICO must prepare a report summarizing each noncompliance issue noted during the completion of the ICO checklists. This report must include the ICO's recommended corrective action plan for each noncompliant item. The report is submitted to the casino's management for review and response. The General Manager, who is responsible for the implementation of the corrective action must sign the Statement of Compliance Checklist. The review completed for the period of January – June is due to the Division by July 31, and the review for July – December is due to the Division by January 31 of each year. A report must be submitted even if no violation occurred. Instructions for completing the ICMP Compliance Checklists for Internal Compliance Officers and submitting the ICO report are located on the Division's website. Ensure the submissions are complete, timely and have the appropriate signatures.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**ICMP – ACCOUNTING – O. STATEWIDE AND MULTI-STATE MULTI-LINK SYSTEMS**

**General**

1. The following provides an explanation of accounting procedures for statewide and multi-state multi-link progressive systems. The revenue cycle of a slot machine connected to a statewide

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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and multi-state multi-link system is no different from that of any other slot machine. Funds are dropped, counted, and taxed using the same procedures used for other machines. Primary jackpots and secondary jackpots (if applicable) for slot machines are treated differently for purposes of calculating AGP. Interview your accounting personnel to determine their understanding of this procedure.

**Jackpot Deductions on Tax Returns**

1. If the statewide and multi-state multi-link system offers a secondary jackpot that is reimbursed by the system vendor, the following applies. When licensees pay out secondary jackpots, 100% of the amount paid to the patron is not deducted to arrive at taxable AGP on the gaming tax return. The pro-rated portion of the secondary jackpot is the amount allowed as a deduction on the gaming tax return to arrive at taxable AGP. The statewide multi-state multi-link vendor will send a report to each licensee with its individual pro-rated portion of that jackpot detailed on the report. A copy of the report should be maintained with the licensee's copy of the tax return to adequately document any deduction. It is the licensee's responsibility to obtain these reports in the event the vendor does not automatically send them to the licensee. The licensee's pro-rated portion of the statewide and multi-state secondary jackpots paid during the month, are reported in the "Statewide Contributions" box for the corresponding slot denomination on the monthly gaming tax return. Interview accounting personnel to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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2. All primary jackpots won by patrons will be paid directly by the statewide and multi-state multi-link vendor. Similar to secondary jackpots, each licensee will receive a report detailing its pro-rated portion of the jackpot that is allowable as a deduction on the tax return to arrive at taxable AGP. The licensee's pro-rated portion of statewide primary jackpots paid during the month, is reported in the "Statewide Contributions" box for the corresponding multi-denomination slot denomination on the monthly gaming tax return. Interview accounting personnel to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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3. The licensee typically pays a certain percentage of coin in to the statewide and multi-state multi-link vendor on a periodic basis. The payment to the vendor is not a deduction in calculating taxable AGP; only the pro-rated portion of the jackpot (as discussed above) is allowed as a deduction in the month in which the jackpot is won. Interview accounting personnel to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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4. When a patron wins a secondary jackpot, which initiates a hand pay, the payout procedures are the same as they are for any other jackpot. However, the licensee will mark the box on the jackpot payout slip titled "Secondary Jackpot – Statewide Multi-link". Statewide and multi-state secondary jackpots paid by a licensee are reported in the "Statewide Secondaries" box for the multi-denomination slot denomination on the monthly gaming tax return. Interview accounting personnel to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**ICMP – ACCOUNTING – P. CHIP AND TOKEN PROCEDURES**

**Chip and Token Accountability - General Accountability**

To account for chips and tokens, licensees shall perform the following:

1. For all new casinos, an initial inventory of all chips and tokens must be conducted. There must be two independent counts (inventories) conducted by at least two licensed casino employees. Independent means that the person conducting the first inventory is different from the person conducting the second inventory. Both inventories must be documented.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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The documentation shall include:

- a. The date the chips and tokens were received,
- b. The date the inventory was conducted,
- c. An itemization by denomination (one for chips; another for tokens),
- d. Printed names and signatures of the individuals who conducted the inventory, as well as their corresponding license numbers, and
- e. A copy of the related invoice.

Any deviation between the invoice accompanying the chips and tokens and the actual chips and tokens received, as well as any defects found (i.e., anything that differs from the approved artwork), must be reported to the Audit section of the Division's local office. The Division will then determine the appropriate course of action. In situations of discrepancies or defects, no circulation of chips and tokens into the current inventory shall be completed until approval by the Division has been obtained. Upon resolution, a final reconciliation of the manufacturer's invoice to the actual inventory must be performed and documented, with supporting documentation for all reconciling items. Interview your accounting personnel to determine their understanding of this procedure.

2. Subsequent to opening, additional chips and tokens received from a manufacturer or distributor must be inventoried by at least two licensed employees of the casino, one of whom shall be from the accounting department. The inventory documentation shall comply with the requirements specified in paragraph #1. Interview accounting personnel to determine their understanding of this procedure. If any chips or tokens have been received during the review period, review the documentation for compliance.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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3. Chips and tokens that are not in active use may be stored in a casino vault, a cashier cage, or other comparable secure area. In addition to the quarterly inventory requirements specified below, an inventory must be conducted any time chips and tokens are removed from, or returned to, the storage area. The inventory shall be conducted after the removal/return and must reconcile to the previous inventory. Supporting documentation must be attached for all reconciling items. The inventory documentation shall indicate the location of the chips and tokens in the licensee's possession, and comply with the requirements specified above in paragraph 1(b)-1(d).

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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4. Upon adoption of a new properly registered trade name, the licensee may petition the

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Director to approve a redemption plan pursuant to CLGR 30-1304 to affect the cancellation of a chip and/or token series. (See the Chip and Token Destruction Process). If licensee has chips or tokens that are not in active use, review the inventory documentation for compliance and proper supporting documentation.

**Quarterly Reconciliation**

- Licensees must have written accounting procedures in place that enable them to perform and document an accurate inventory and reconciliation of all chips and tokens, as well as the corresponding liability for all outstanding chips and tokens. Additionally, an estimated hopper amount for all machines with tokens must be included in the inventory calculation. The estimate can be calculated by using the most current hopper count or a reasonable percentage of the hopper fill amount. Whichever method is used, it must be consistently applied each time. The inventory of chips and tokens shall be conducted at the end of each quarter, and the reconciliation shall be completed no later than the end of the month immediately following the quarter. Interview your accounting personnel to determine their understanding of this procedure. Review the written procedures to determine if they are adequate and meet the requirements.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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- Each inventory shall be completed by two licensed employees performing independent counts, and reconciled to the previous inventory, by Accounting, with accurate and complete documentation supporting the changes in inventory. Interview your accounting personnel to determine their understanding of this procedure. Review the last inventory and reconciliation to determine if it meets the ICMP requirements.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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- The formula for calculating the liability of outstanding chips and tokens is:

Total of all chips and tokens placed into service at opening  
 Plus: Chips & tokens purchased since day 1 through the last day of the prior quarter  
 Less: Chips & tokens destroyed since day 1 through the last day of the prior quarter  
 Less: Cancellation of a chip and/or token series through the last day of the prior quarter

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Equals: Total of chips & tokens at beginning of current quarter  
 Plus: Chips & tokens purchased during the current quarter  
 Less: Chips & tokens destroyed during the current quarter  
 Less: Cancellation of a chip and/or token series during the current quarter  
 Equals: Balance of chips and tokens  
 Less: Chip & token inventory on hand at end of current quarter  
 Equals: Chip & token float at end of current quarter\*

\*This float amount carries over to the minimum bankroll analysis worksheet. Pull the last quarterly inventory to determine if the formula was properly calculated and does not result in a negative number.

**Minimum Bankroll Requirements**

- The liability of outstanding chips and tokens, as calculated during the quarterly inventory, shall be included on the minimum bankroll analysis worksheet. The December 31 inventory

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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balance and liability for outstanding chips and tokens shall be reported as an asset and a liability, respectively, on the licensee's standard financial statements. Interview your accounting personnel to determine their understanding of this procedure. Review the most recent MBA to determine if the correct amount has been used.

**Foreign Chips and Tokens**

1. Foreign chips and tokens are defined as any chips and tokens issued by another gaming establishment. Foreign chips and tokens can include those from existing operating casinos and/or from closed casinos. The Division is concerned when foreign chips and tokens from closed Colorado casinos or from any casinos outside Colorado show up in a licensee's inventory. Therefore, if the licensee finds \$20 or more of foreign chips or tokens from closed Colorado casinos or any casino outside of Colorado in a drop period, it must immediately contact the Enforcement section of the local Division of Gaming office. The Division will determine if an investigation is warranted. If a licensee finds fewer than \$20 of foreign chips or tokens from closed Colorado casinos or any casino outside of Colorado, the licensee will retain the chips and tokens and arrange for destruction. Prior to destroying the chips and tokens, a destruction plan must be submitted to, and approved by, the Division. See Chip and Token Destruction procedures below. Interview your licensee personnel to determine their understanding of this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**Chip and Token Destruction**

1. Licensees who maintain an operating licensed establishment, but wish to destroy all or part of its existing chip/token inventory (which may also include mutilated and foreign chips and tokens), must prepare a written plan for the destruction of those chips and tokens. This plan is submitted to the Division for approval at least 10 days before the anticipated destruction. These licensed establishments shall continue to honor all of their outstanding chips and tokens presented for redemption as long as the establishment remains open or until a new properly registered trade name has been completed and a redemption plan has been approved by the Director. Interview your management personnel to determine their understanding of this procedure. If destruction has taken place during this review period, review the last destruction paperwork to determine compliance with this procedure.
2. The objective of a destruction plan is to ensure chips and tokens are disposed of in a manner that complies with Rule 13 of the Colorado Limited Gaming Regulations. Destruction plans must include:
  - a. Scheduled date and location of destruction, which must be approved by the Division. Destruction must occur within the state of Colorado.
  - b. Name(s) and license numbers of person(s) that will perform the destruction.
  - c. Number of and dollar value of chips and/or tokens, by denomination, to be destroyed. This number must be reconciled to the previous, most recent quarterly inventory with accurate and complete documentation supporting any changes in inventory. The licensee maintains the reconciliation and is not required to submit this to the Division.
  - d. A detailed explanation of the method of destruction.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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- e. For foreign chips and tokens, the number of and dollar value of chips and/or tokens by denomination and casino name. Foreign chips and tokens from casinos outside of Colorado can be listed as one line item and noted as such.

The Division will provide written approval of all destruction plans prior to the licensee destroying any chips or tokens. Interview your management personnel to determine their understanding of this procedure. If destruction has taken place during this review period, review the paperwork to determine compliance.

**Pre-Destruction Inventory**

1. Prior to removal from the licensed premises, a pre-destruction inventory of the chips and/or tokens shall be conducted by at least two licensed individuals. This inventory shall be reconciled to the inventory shown in the approved destruction plan. Any discrepancies between the amount shown in the destruction plan and the amount counted during the pre-destruction inventory must be explained and supported. Interview your management personnel to determine their understanding of this procedure. If destruction has taken place during this review period, review the paperwork to determine compliance.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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2. In addition to the pre-destruction inventory, a weigh shall be obtained of the total chips to be destroyed and a weigh of the total tokens to be destroyed. This weigh shall be performed by the destruction company and must be recorded on the inventory forms. A copy of all inventory documentation, including weigh scale tape, if applicable, and any other supporting information, shall be maintained by the casino. This documentation is provided to the Division within five business days following the inventory. Interview your management personnel to determine their understanding of this procedure. If destruction has taken place during this review period, review the paperwork to determine compliance

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**Time of Destruction**

There are two options for performing the destruction:

1. Two licensed individuals, one of whom is independent of the destruction company, are present for the destruction of all chips and tokens; or
2. The licensed employee of the destruction company or the licensed employee of the licensee participating in the destruction may perform the destruction with video coverage of the entire process.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Either a weigh scale tape is produced and signed by both individuals (option 1), or the video coverage shall include a pre-destruction weigh display (e.g., LED display or weigh scale tape image), the entire destruction process, and the post-destruction weigh (option 2). A copy of the video recording must be maintained by the licensee for 30 days. Interview your management to determine their understanding of this procedure. If destruction has taken place during this review period, review the paperwork to determine compliance

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**Post-Destruction Verification**

1. Upon completion of destruction, the destruction company will obtain and document a weigh of the total chips destroyed and a weigh of the total tokens destroyed. Any discrepancies of 1% or greater between the pre-destruction weigh and the post-destruction weigh must be explained. This information, accompanied by all weigh scale tapes (if available), must be provided to the Division within five business days following the destruction. The documentation for all inventories and weighs shall include the date of the event and the printed names, related signatures, and license numbers of all individuals involved. Interview your management to determine their understanding of this procedure. If destruction has taken place during this review period, review the paperwork to determine compliance

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**REVIEW OF STATISTICAL REPORTS**

**Name of Licensee:** \_\_\_\_\_

**Title of Report:** Monthly Slot Revenue Summary

**Reviewer's Initials:** \_\_\_\_\_

**Time Period Reviewed:** \_\_\_\_\_

1. Does the report reflect the month, year, and licensee's name?

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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2. If EPCS is enabled and the MSRS does not include the required EPCS information, does the licensee have a supplemental report containing the required data elements to accurately calculate the MSRS? Does the written accounting plan state how the licensee will supplement the report to include EPCS data?

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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3. Is each drop period for the month included on the report? (The last drop of the month must include coin, currency, and tickets.) (NOTE: If Drops are not conducted daily, check files to ensure the drop dates shown, are the same as those submitted to the Division.)

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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4. For each drop period, are totals reported by denomination and in total for coin-in, actual drop, E-Drop, actual tickets drop (includes slot coupons), actual jackpots, fills, all tickets redeemed, non-cashable electronic promotional credits activity out, hopper adjustments, and AGP?

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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5. Do the grand totals for coin-in, actual drop, E-Drop, actual tickets drop (includes slot coupons), actual jackpots, fills, all tickets redeemed, non-cashable electronic promotional credits activity out, hopper adjustments, and AGP agree to the tax return? You must tie the MSRS to the gaming tax return. Document the grand totals for each.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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6. Have any variances between the MSRS and tax return (should be indicated on the Tax Template) been adequately explained? Document any variance amounts and explanations.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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7. Do all monthly totals on the MSRS trace to the corresponding Tax Template. Document any amounts that do not trace and explanations.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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8. Was the report prepared timely? Did the preparer initial the report? Document the date the report was prepared and the preparer's name.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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9. Was secondary level of review conducted timely? Did the reviewer initial the report? Document the date secondary level of review was conducted and the reviewer's name.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**ICMP Compliance Checklist: Section 11, ACCOUNTING**  
**For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

**Legend:**

**C** = In Compliance

**N** = Noncompliance

**2C** = In Compliance at Follow-up

**2N** = Noncompliance at Follow-up

**REVIEW OF STATISTICAL REPORTS**

**Name of Licensee:** \_\_\_\_\_

**Title of Report:** Drop Comparison Report (Drop Report)

**Reviewer's Initials:** \_\_\_\_\_

**Time Period Reviewed:** \_\_\_\_\_

1. Does the report reflect the month, year, and licensee's name?

C	N	2C	2N
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2. Does the report reflect current, MTD and YTD information for each machine?

C	N	2C	2N
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3. Does the report reflect metered drop amount for each machine?

C	N	2C	2N
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4. Does the report reflect actual drop (coin and bill) for each machine?

C	N	2C	2N
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5. Does the report reflect all denominations and subtotals by denomination? Does the report reflect grand totals for current, MTD and YTD for all denominations?

C	N	2C	2N
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6. Does the report reflect variances expressed in both dollar amounts and as a percentage?

C	N	2C	2N
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7. Are percent variances properly calculated (i.e., dollar variance divided by the metered drop amount)? Select one machine and recalculate this variance. Document the machine tested and results.

C	N	2C	2N
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8. Are all variances equaling or exceeding 2% and equaling or exceeding \$25 identified on a drop-by-drop basis? Document the number of variances exceeding the threshold and requiring an investigation, including the machine number and dollar variance amount.

C	N	2C	2N
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9. Are variances being investigated and explained, with the explanation documented, on a timely basis? Request a current period report to determine variances are investigated timely in accordance with the Written Accounting Plan.

C	N	2C	2N
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10. Do the results of the investigation meet the adequate explanation criteria per the ICMP? Review the most recent variance explanation(s) to determine compliance. Document the machine number, variance amount and explanation.

C	N	2C	2N
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**ICMP Compliance Checklist: Section 11, ACCOUNTING**  
**For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

**Legend:**

**C** = In Compliance

**N** = Noncompliance

**2C** = In Compliance at Follow-up

**2N** = Noncompliance at Follow-up

11. Are variances being reviewed by the accounting personnel to determine reasonableness of the investigation and explanation? Are investigations performed by the Slot Department returned to the Accounting Department timely according to the accounting plan? Review the most recent variance investigations from the Slot Department to determine compliance.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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12. Have any variances between the drop report and the MSRS (should be indicated on the Tax Template) been adequately explained? You must tie the drop amounts from the drop comparison report to the MSRS for each denomination and in total. Document the dollar amounts per the drop report, the dollar amounts per the MSRS, the difference between the two reports and the explanation, if applicable.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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13. Do all monthly totals on the drop report trace to the corresponding Tax Template by denomination and in total? Document any differences and the explanation for the difference.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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14. Are there “zeroed out” meters? If so, the Accounting Department must notify the Slot Department to determine the cause of the reset. The licensee must use this information to complete the meter reset form whenever the soft meter(s) are cleared or reset. Document the machine numbers with zeroed out meter(s).

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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15. Are adjustments made to meter or actual amounts properly supported and documented? Review the last adjustment and determine compliance. Document the machine number, the pre and post adjusted amounts, and explanation.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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16. Is the report prepared timely? Did the preparer initial the report? Document the date the report was prepared and the preparer’s name.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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17. Was secondary level of review conducted timely? Did the reviewer initial the report? Document the date secondary level of review was conducted and the reviewer’s name.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**ICMP Compliance Checklist: Section 11, ACCOUNTING**  
**For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

**Legend:**

**C** = In Compliance

**N** = Noncompliance

**2C** = In Compliance at Follow-up

**2N** = Noncompliance at Follow-up

**REVIEW OF STATISTICAL REPORTS**

**Name of Licensee:** \_\_\_\_\_

**Title of Report:** Jackpot Comparison Report (Jackpot Report)

**Reviewer's Initials:** \_\_\_\_\_

**Time Period Reviewed:** \_\_\_\_\_

1. Does the report reflect the month, year, and licensee's name?

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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2. Does the report reflect current, MTD and YTD information for each machine?

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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3. Does the report reflect metered jackpot amount (attendant paid jackpots, attendant paid progressive payout, attendant paid cancelled credits and attendant paid external bonus (if applicable) for each machine?

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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4. Does the report reflect actual jackpot amount (attendant paid jackpots, attendant paid progressive payout, attendant paid cancelled credits and attendant paid external bonus (if applicable) for each machine?

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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5. Does the report reflect all denominations and subtotals by denomination? Does the report reflect grand totals for current, MTD and YTD for all denominations?

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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6. Does the report reflect variances expressed in both dollar amounts and as a percentage?

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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7. Are percent variances properly calculated (i.e., dollar variance divided by the metered jackpot amount)? Select one machine and recalculate its variance. Note the machine tested and results.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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8. Are all variances equaling or exceeding 1% and equaling or exceeding \$10 identified on a drop-by-drop basis? Document the number of variances exceeding the threshold and requiring an investigation, including the machine number and dollar variance amount.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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9. Are variances being investigated and explained, with the explanation documented, on a timely basis? Request a current period report to determine variances are investigated timely in accordance with the Written Accounting Plan.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**ICMP Compliance Checklist: Section 11, ACCOUNTING**  
**For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

**Legend:**

**C** = In Compliance

**N** = Noncompliance

**2C** = In Compliance at Follow-up

**2N** = Noncompliance at Follow-up

10. Do the results of the investigation meet the adequate explanation criteria per the ICMP? Review the most recent variance explanation(s) to determine compliance. Document the machine number, variance amount and explanation.
 

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------
  
11. Are variances being reviewed by the accounting personnel to determine reasonableness of the investigation and explanation? Are investigations performed by the Slot Department returned to the Accounting Department timely in accordance with the accounting plan? Review the most recent variance investigations from the Slot Department to determine compliance.
 

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------
  
12. Have any variances between the jackpot report and the MSRS (should be indicated on the Tax Template) been adequately explained? You must tie the jackpot amounts from the jackpot report to the MSRS for each denomination and in total. Document the dollar amounts per the jackpot report, the dollar amounts per the MSRS, the difference between the two reports and the explanation if applicable.
 

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------
  
13. Do all monthly totals on the jackpot report trace to the corresponding Tax Template by denomination and in total? Document any differences and the explanation for the difference.
 

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------
  
14. Are there "zeroed out" meters? If so, the Accounting Department must notify the Slot Department to determine the cause of the reset. The licensee must use this information to complete the meter reset form whenever the soft meter(s) are cleared or reset. Document the machine numbers with zeroed out meter(s).
 

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------
  
15. Are adjustments made for \$0.99 or less for tokenized payouts on the jackpot report? Are the adjustments adequately documented per ICMP requirements?
 

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------
  
16. Does the licensee offer additional payouts? Are the additional payouts reflected on the jackpot report? Select a sample of additional payout jackpot slips. Review the slips to ensure the payout meets the condition for the additional payout program (compare the slip to the additional payout request). Document the machine number, jackpot slip number, dollar amount, date and additional payout name.
 

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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17. Additional payouts may only be deducted for machines that have been approved. Check the machines that have been approved for additional payouts from the additional payout request form to the additional payout deductions the licensee has deducted for each slot machine. Document any discrepancies and ensure no additional payout deductions were taken for machines or additional payout programs not approved by the Division.
 

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**ICMP Compliance Checklist: Section 11, ACCOUNTING**  
**For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

**Legend:**

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18. Review a sample of at least ten jackpot slips with additional payouts for the six-month period for proper slip completion. A patron's signature and large jackpot approval signature must be captured on each jackpot slip for any additional payouts (NOTE: this step can be completed in conjunction with the regular jackpot/fill slip attribute testing).

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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19. Ticket information is not included on the jackpot report.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

20. Are adjustments made to meter or actual amounts properly supported and documented? Review the last adjustment and determine compliance. Document the machine number, the pre and post adjusted amounts, and explanation.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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21. Is the report prepared timely? Did the preparer initial the report? Document the date the report was prepared and the preparer's name.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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22. Was secondary level of review conducted timely? Did the reviewer initial the report? Document the date secondary level of review was conducted and the reviewer's name.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**ICMP Compliance Checklist: Section 11, ACCOUNTING**  
**For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

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**C** = In Compliance

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**REVIEW OF STATISTICAL REPORTS**

**Name of Licensee:** \_\_\_\_\_

**Title of Report:** Theoretical Hold Report (Hold Report)

**Reviewer's Initials:** \_\_\_\_\_

**Time Period Reviewed:** \_\_\_\_\_

1. Does the report reflect the month, year, and licensee's name?

C	N	2C	2N
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2. Is there a separate report for MTD information and YTD information (two separate reports)? Do the reports reflect each machine for each denomination? Is the YTD report prepared on a rolling twelve month period?

C	N	2C	2N
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3. Do the reports reflect subtotals by denomination as well as a grand total for all denominations?

C	N	2C	2N
---	---	----	----

4. Do the reports reflect coin in, bill & coin drop, ticket drop, E-drop, hand pay jackpots, fills, tickets issued, non-cashable credits uploaded by gaming device, AGP, actual hold, theoretical hold and percent variance for each machine?

C	N	2C	2N
---	---	----	----

5. Are actual hold percentages properly calculated (AGP divided by coin in)? Select one machine per denomination and recalculate the actual hold percentage. Document machines tested and results.

C	N	2C	2N
---	---	----	----

6. Is AGP for ticket enabled and/or EPCS-enabled devices properly calculated (actual drop + tickets & slot coupons redeemed + E-drop – fills – actual hand pays – tickets issued by device – non-cashable credits uploaded by gaming device)? Select one machine per denomination and recalculate AGP. Document machines tested and results.

C	N	2C	2N
---	---	----	----

7. Does the variance column represent the percent variance between actual hold and theoretical hold (par)? Using the machines (non-ticket enabled and ticket enabled devices) selected above, recalculate this variance. Document machines tested and results.

C	N	2C	2N
---	---	----	----

8. Are all variance thresholds established in the Written Accounting Plan? Are all unusual and/or large MTD **AND** all unusual and/or large YTD variances being investigated? Document the number of variances exceeding the threshold and requiring an investigation, including the machine number and percent variance amount.

C	N	2C	2N
---	---	----	----

**ICMP Compliance Checklist: Section 11, ACCOUNTING**  
**For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

**Legend:**

**C** = In Compliance

**N** = Noncompliance

**2C** = In Compliance at Follow-up

**2N** = Noncompliance at Follow-up

9. Are variances being investigated and explained, with the explanation documented, on a timely basis? Request a current period report to determine variances are investigated timely in accordance with the Written Accounting Plan.
 

C	N	2C	2N
---	---	----	----
  
10. Do the results of the investigation meet the adequate explanation criteria per the ICMP? Review the most recent variance explanation(s) to determine compliance. Document the machine number, variance amount and explanation.
 

C	N	2C	2N
---	---	----	----
  
11. Are variances being reviewed by the accounting personnel to determine reasonableness of the investigation and explanation? Are investigations performed by the Slot Department returned to the Accounting Department timely in accordance with the Written Accounting Plan? Review the most recent variance investigations from the Slot Department to determine compliance.
 

C	N	2C	2N
---	---	----	----
  
12. Have any variances between the hold report and the MSRS (should be indicated on the Tax Template) been adequately explained? AGP on the hold report will not trace to the AGP on the MSRS as the hold report includes all issued tickets and the MSRS includes only redeemed tickets. You must tie the coin in amounts from the hold report to the MSRS for each denomination and in total. Document the dollar amounts per the hold report, the dollar amounts per the MSRS, the difference between the two reports and the explanation if applicable.
 

C	N	2C	2N
---	---	----	----
  
13. Do all monthly totals on the hold report trace to the corresponding Tax Template by denomination and in total? Document any differences and the explanation for the difference.
 

C	N	2C	2N
---	---	----	----
  
14. Are there "zeroed out" meters? If so, the Accounting Department must notify the Slot Department to determine the cause of the reset. The licensee must use this information to complete the meter reset form whenever the soft meter(s) are cleared or reset. Document the machine numbers with zeroed out meter(s).
 

C	N	2C	2N
---	---	----	----
  
15. Are adjustments made to meter or actual amounts properly supported and documented? Review the last adjustment and determine compliance. Document the machine number, the pre and post adjusted amounts, and explanation.
 

C	N	2C	2N
---	---	----	----

**ICMP Compliance Checklist: Section 11, ACCOUNTING**  
**For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

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**2N** = Noncompliance at Follow-up

16. Verify the accuracy of the theoretical holds on the report to the par sheet for the lesser of five machines per denomination or 10% of the machines per denomination. Document the machine numbers tested and the results. (NOTE: If one theoretical hold does not agree to the par sheet, inquire what procedures are in place to ensure par values are accurate on the report. If procedures are not adequate, the licensee must test 100% of the machines.)

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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17. Are adequate procedures in place to communicate hold percentage changes (e.g., due to machine conversions) to the Accounting Department? Ask licensee to describe these procedures.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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18. Is AGP shown with additional payouts?

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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19. Is the report prepared timely? Did the preparer initial the report? Document the date the report was prepared and the preparer's name.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

20. Was secondary level of review conducted timely? Did the reviewer initial the report? Document the date secondary level of review was conducted and the reviewer's name.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**ICMP Compliance Checklist: Section 11, ACCOUNTING**  
**For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

**Legend:**

**C** = In Compliance

**N** = Noncompliance

**2C** = In Compliance at Follow-up

**2N** = Noncompliance at Follow-up

**REVIEW OF STATISTICAL REPORTS**

**Name of Licensee:** \_\_\_\_\_

**Title of Report:** Ticket Out Comparison Report (TO Report)

**Reviewer's Initials:** \_\_\_\_\_

**Time Period Reviewed:** \_\_\_\_\_

1. Does the report reflect the month, year, and licensee's name?

C	N	2C	2N
---	---	----	----

2. Does the report reflect current, MTD and YTD information for each machine?

C	N	2C	2N
---	---	----	----

3. Does the report reflect all denominations and subtotals by denomination? Does the report reflect grand totals for current, MTD and YTD for all denominations?

C	N	2C	2N
---	---	----	----

4. Does the report reflect metered ticket out amount for each machine?

C	N	2C	2N
---	---	----	----

5. Does the report reflect actual ticket out amount for each machine?

C	N	2C	2N
---	---	----	----

6. Does the report reflect variances expressed in both dollar amounts and as a percentage?

C	N	2C	2N
---	---	----	----

7. Are percent variances properly calculated (i.e., dollar variance divided by the metered amount)? Select one machine and recalculate this variance. Note the machine tested and results.

C	N	2C	2N
---	---	----	----

8. Are all variances equaling or exceeding 1% and equaling or exceeding \$10 identified on a drop-by-drop basis? Document the number of variances exceeding the threshold and requiring an investigation, including the machine number and dollar variance amount.

C	N	2C	2N
---	---	----	----

9. Are variances being investigated and explained, with the explanation documented, on a timely basis? Request a current period report to determine variances are investigated timely in accordance with the accounting plan.

C	N	2C	2N
---	---	----	----

10. Do the results of the investigation meet the adequate explanation criteria per the ICMP? Review the most recent variance explanation(s) to determine compliance. Document the machine number, variance amount and explanation.

C	N	2C	2N
---	---	----	----

**ICMP Compliance Checklist: Section 11, ACCOUNTING**  
**For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

**Legend:**

**C** = In Compliance

**N** = Noncompliance

**2C** = In Compliance at Follow-up

**2N** = Noncompliance at Follow-up

11. Are variances being reviewed by the accounting personnel to determine reasonableness of the investigation and explanation? Are investigations performed by the Slot Department returned to the Accounting Department timely with in accordance with the Written Accounting Plan? Review the most recent variance investigations from the Slot Department to determine compliance.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

12. Are there “zeroed out” meters? If so, the Accounting Department must notify the Slot Department to determine the cause of the reset. The licensee must use this information to complete the meter reset form whenever the soft meter(s) are cleared or reset. Document the machine numbers with zeroed out meter(s).

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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13. Are adjustments made to meter or actual amounts properly supported and documented? Review the last adjustment and determine compliance. Document the machine number, the pre and post adjusted amounts, and explanation.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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14. Is the report prepared timely? Did the preparer initial the report? Document the date the report was prepared and the preparer’s name.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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15. Was secondary level of review conducted timely? Did the reviewer initial the report? Document the date secondary level of review was conducted and the reviewer’s name.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**ICMP Compliance Checklist: Section 11, ACCOUNTING**  
**For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

**Legend:**

**C** = In Compliance

**N** = Noncompliance

**2C** = In Compliance at Follow-up

**2N** = Noncompliance at Follow-up

**REVIEW OF STATISTICAL REPORTS**

**Name of Licensee:** \_\_\_\_\_

**Title of Report:** Ticket In Comparison Report (TI Report)

**Reviewer's Initials:** \_\_\_\_\_

**Time Period Reviewed:** \_\_\_\_\_

1. Does the report reflect the month, year, and licensee's name?

C	N	2C	2N
---	---	----	----

2. Does the report reflect current, MTD and YTD information for each machine?

C	N	2C	2N
---	---	----	----

3. Does the report reflect metered ticket in amount for each machine?

C	N	2C	2N
---	---	----	----

4. Does the report reflect actual ticket in for each machine?

C	N	2C	2N
---	---	----	----

5. Does the report reflect all denominations and subtotals by denomination? Does the report reflect grand totals for current, MTD and YTD for all denominations?

C	N	2C	2N
---	---	----	----

6. Does the report reflect variances expressed in both dollar amounts and as a percentage?

C	N	2C	2N
---	---	----	----

7. Are percent variances properly calculated (i.e., dollar variance divided by the metered amount)? Select one machine and recalculate this variance. Note the machine tested and results.

C	N	2C	2N
---	---	----	----

8. Are all variances equaling or exceeding 1% and equaling or exceeding \$10 identified on a drop-by-drop basis? Document the number of variances exceeding the threshold and requiring an investigation, including the machine number and dollar variance amount.

C	N	2C	2N
---	---	----	----

9. Are variances being investigated and explained, with the explanation documented, on a timely basis? Request a current period report to determine variances are investigated timely in accordance with the accounting plan.

C	N	2C	2N
---	---	----	----

10. Do the results of the investigation meet the adequate explanation criteria per the ICMP? Review the most recent variance explanation(s) to determine compliance. Document the machine number, variance amount and explanation.

C	N	2C	2N
---	---	----	----

**ICMP Compliance Checklist: Section 11, ACCOUNTING**  
**For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

**Legend:**

**C** = In Compliance

**N** = Noncompliance

**2C** = In Compliance at Follow-up

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11. Are variances being reviewed by the accounting personnel to determine reasonableness of the investigation and explanation? Are investigations performed by the Slot Department returned to the Accounting Department timely with in accordance with the Written Accounting Plan? Review the most recent variance investigations from the Slot Department to determine compliance.
 

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------
  
12. Have any variances between the ticket in report and the MSRS (should be indicated on the Tax Template) been adequately explained? You must tie the drop amounts from the ticket in report to the MSRS for each denomination and in total. Document the dollar amounts per the ticket in report, the dollar amounts per the MSRS, the difference between the two reports and the explanation if applicable.
 

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------
  
13. Do all monthly totals on the ticket in report trace to the corresponding Tax Template by denomination and in total? Document any differences and the explanation for the difference.
 

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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14. Are there “zeroed out” meters? If so, the Accounting Department must notify the Slot Department to determine the cause of the reset. The licensee must use this information to complete the meter reset form whenever the soft meter(s) are cleared or reset. Document the machine numbers with zeroed out meter(s).
 

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------
  
15. Are adjustments made to meter or actual amounts properly supported and documented? Review the last adjustment and determine compliance. Document the machine number, the pre and post adjusted amounts, and explanation.
 

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------
  
16. Is the report prepared timely? Did the preparer initial the report? Document the date the report was prepared and the preparer’s name.
 

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------
  
17. Was secondary level of review conducted timely? Did the reviewer initial the report? Document the date secondary level of review was conducted and the reviewer’s name.
 

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

**ICMP Compliance Checklist: Section 11, ACCOUNTING**  
**For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

**Legend:**

**C** = In Compliance

**N** = Noncompliance

**2C** = In Compliance at Follow-up

**2N** = Noncompliance at Follow-up

**REVIEW OF STATISTICAL REPORTS**

**Name of Licensee:** \_\_\_\_\_

**Title of Report:** Cashable Electronic Promotion In Comparison Report (CEP-In Report)

**Reviewer's Initials:** \_\_\_\_\_

**Time Period Reviewed:** \_\_\_\_\_

1. The impact on AGP due to EPCS is downloaded cashable electronic promotional credits plus downloaded non-cashable electronic promotional credits (E-Drop) minus uploaded non-cashable electronic promotional credits. No deduction from AGP is allowed if the EPCS does not permit the upload of non-cashable credits. Verify no deductions were taken if EPCS does not permit the upload of non-cashable credits.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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2. The EPCS must be able to pull machine soft meters and compare those meters to the system's electronic promotional credit activity.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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3. Does the report reflect current, MTD and YTD electronic promotional information for each machine?

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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- a. Do the MTD totals on this report agree to the amounts shown on the MSRS?

4. Information needed to prepare the EPCS Meter Comparison Reports includes the deltas between current and prior meter readings compared to the electronic promotional credit activity from the system. The incremental change in the meters reflects what the slot machine recorded as electronic promotional credit in and/or out in the current drop period. The report compares the change in the system to the corresponding cashable or non-cashable activity column indicating a variance between the meter incrementation and the system's electronic promotional activity, as reported by the system, by gaming device.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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5. Does the report have a column that shows the amount of any variances and a column that shows the variance percent by each machine?

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

6. Does the report reflect all denominations and subtotals by denomination? Does the report reflect grand totals for current, MTD and YTD for all denominations?

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

7. Are percent variances properly calculated (i.e., variance amount divided by the metered amount)? Select one machine and recalculate this variance. Note the machine tested and results.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

**ICMP Compliance Checklist: Section 11, ACCOUNTING**  
**For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

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**2C** = In Compliance at Follow-up

**2N** = Noncompliance at Follow-up

8. Are all variances equaling or exceeding 1% and equaling or exceeding \$10 identified on a drop-by-drop basis? Document the number of variances exceeding the threshold and requiring an investigation, including the machine number and dollar variance amount.
 

C	N	2C	2N
---	---	----	----
  
9. Are variances being investigated and explained, with the explanation documented, on a timely basis? Request a current period report to determine variances are investigated timely in accordance with the accounting plan.
 

C	N	2C	2N
---	---	----	----
  
10. Do the results of the investigation meet the adequate explanation criteria per the ICMP? Review the most recent variance explanation(s) to determine compliance. Document the machine number, variance amount and explanation.
 

C	N	2C	2N
---	---	----	----
  
11. Are variances being reviewed by the accounting personnel to determine reasonableness of the investigation and explanation? Are investigations performed by the Slot Department returned to the Accounting Department timely with in accordance with the Written Accounting Plan? Review the most recent variance investigations from the Slot Department to determine compliance.
 

C	N	2C	2N
---	---	----	----
  
12. Have any variances between the report and the MSRS (should be indicated on the Tax Template) been adequately explained? You must tie the drop amounts from the report to the MSRS for each denomination and in total. Document the amounts per the report, the amounts per the MSRS, the difference between the two reports and the explanation if applicable.
 

C	N	2C	2N
---	---	----	----
  
13. Do all monthly totals on the report trace to the corresponding Tax Template by denomination and in total? Document any differences and the explanation for the difference.
 

C	N	2C	2N
---	---	----	----
  
14. Are there "zeroed out" meters? If so, the Accounting Department must notify the Slot Department to determine the cause of the reset. The licensee must use this information to complete the meter reset form whenever the soft meter(s) are cleared or reset. Document the machine numbers with zeroed out meter(s).
 

C	N	2C	2N
---	---	----	----
  
15. Are adjustments made to meter or actual amounts properly supported and documented? Review the last adjustment and determine compliance. Document the machine number, the pre and post adjusted amounts, and explanation.
 

C	N	2C	2N
---	---	----	----

**ICMP Compliance Checklist: Section 11, ACCOUNTING**  
**For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

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**2C** = In Compliance at Follow-up

**2N** = Noncompliance at Follow-up

16. Is the report prepared timely? Did the preparer initial the report? Document the date the report was prepared and the preparer's name.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

17. Was secondary level of review conducted timely? Did the reviewer initial the report? Document the date secondary level of review was conducted and the reviewer's name.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**ICMP Compliance Checklist: Section 11, ACCOUNTING**  
**For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

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**REVIEW OF STATISTICAL REPORTS**

**Name of Licensee:** \_\_\_\_\_

**Title of Report:** Non-Cashable Electronic Promotion In  
Comparison Report (NCEP-In Report)

**Reviewer's Initials:** \_\_\_\_\_

**Time Period Reviewed:** \_\_\_\_\_

1. The impact on AGP due to EPCS is downloaded cashable electronic promotional credits plus downloaded non-cashable electronic promotional credits (E-Drop) minus uploaded non-cashable electronic promotional credits. No deduction from AGP is allowed if the EPCS does not permit the upload of non-cashable credits. Verify no deductions were taken if EPCS does not permit the upload of non-cashable credits.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

2. The EPCS must be able to pull machine soft meters and compare those meters to the system's electronic promotional credit activity.

3. Does the report reflect current, MTD and YTD electronic promotional information for each machine?

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

- a. Do the MTD totals on this report agree to the amounts shown on the MSRS?

4. Information needed to prepare the EPCS Meter Comparison Reports includes the deltas between current and prior meter readings compared to the electronic promotional credit activity from the system. The incremental change in the meters reflects what the slot machine recorded as electronic promotional credit in and/or out in the current drop period. The report compares the change in the system to the corresponding cashable or non-cashable activity column indicating a variance between the meter incrementation and the system's electronic promotional activity, as reported by the system, by gaming device.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

5. Does the report have a column that shows the amount of any variances and a column that shows the variance percent by each machine?

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

6. Does the report reflect all denominations and subtotals by denomination? Does the report reflect grand totals for current, MTD and YTD for all denominations?

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

7. Are percent variances properly calculated (i.e., variance amount divided by the metered amount)? Select one machine and recalculate this variance. Note the machine tested and results.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

**ICMP Compliance Checklist: Section 11, ACCOUNTING**  
**For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

**Legend:**

**C** = In Compliance

**N** = Noncompliance

**2C** = In Compliance at Follow-up

**2N** = Noncompliance at Follow-up

8. Are all variances equaling or exceeding 1% and equaling or exceeding \$10 identified on a drop-by-drop basis? Document the number of variances exceeding the threshold and requiring an investigation, including the machine number and dollar variance amount.
 

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------
  
9. Are variances being investigated and explained, with the explanation documented, on a timely basis? Request a current period report to determine variances are investigated timely in accordance with the accounting plan.
 

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------
  
10. Do the results of the investigation meet the adequate explanation criteria per the ICMP? Review the most recent variance explanation(s) to determine compliance. Document the machine number, variance amount and explanation.
 

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------
  
11. Are variances being reviewed by the accounting personnel to determine reasonableness of the investigation and explanation? Are investigations performed by the Slot Department returned to the Accounting Department timely with in accordance with the Written Accounting Plan? Review the most recent variance investigations from the Slot Department to determine compliance.
 

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------
  
12. Have any variances between the report and the MSRS (should be indicated on the Tax Template) been adequately explained? You must tie the drop amounts from the report to the MSRS for each denomination and in total. Document the amounts per the report, the amounts per the MSRS, the difference between the two reports and the explanation if applicable.
 

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------
  
13. Do all monthly totals on the report trace to the corresponding Tax Template by denomination and in total? Document any differences and the explanation for the difference.
 

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------
  
14. Are there “zeroed out” meters? If so, the Accounting Department must notify the Slot Department to determine the cause of the reset. The licensee must use this information to complete the meter reset form whenever the soft meter(s) are cleared or reset. Document the machine numbers with zeroed out meter(s).
 

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------
  
15. Are adjustments made to meter or actual amounts properly supported and documented? Review the last adjustment and determine compliance. Document the machine number, the pre and post adjusted amounts, and explanation.
 

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

**ICMP Compliance Checklist: Section 11, ACCOUNTING**  
**For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

**Legend:**

**C** = In Compliance

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**2C** = In Compliance at Follow-up

**2N** = Noncompliance at Follow-up

16. Is the report prepared timely? Did the preparer initial the report? Document the date the report was prepared and the preparer's name.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

17. Was secondary level of review conducted timely? Did the reviewer initial the report? Document the date secondary level of review was conducted and the reviewer's name.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

**ICMP Compliance Checklist: Section 11, ACCOUNTING**  
**For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

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**2C** = In Compliance at Follow-up

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**REVIEW OF STATISTICAL REPORTS**

**Name of Licensee:** \_\_\_\_\_

**Title of Report:** Non-Cashable Electronic Promotion Out  
Comparison Report (NCEP-Out Report)

**Reviewer's Initials:** \_\_\_\_\_

**Time Period Reviewed:** \_\_\_\_\_

1. The impact on AGP due to EPCS is downloaded cashable electronic promotional credits plus downloaded non-cashable electronic promotional credits (E-Drop) minus uploaded non-cashable electronic promotional credits. No deduction from AGP is allowed if the EPCS does not permit the upload of non-cashable credits. Verify no deductions were taken if EPCS does not permit the upload of non-cashable credits.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

2. The EPCS must be able to pull machine soft meters and compare those meters to the system's electronic promotional credit activity.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

3. Does the report reflect current, MTD and YTD electronic promotional information for each machine?

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

- a. Do the MTD totals on this report agree to the amounts shown on the MSRS?

4. Information needed to prepare the EPCS Meter Comparison Reports includes the deltas between current and prior meter readings compared to the electronic promotional credit activity from the system. The incremental change in the meters reflects what the slot machine recorded as electronic promotional credit in and/or out in the current drop period. The report compares the change in the system to the corresponding cashable or non-cashable activity column indicating a variance between the meter incrementation and the system's electronic promotional activity, as reported by the system, by gaming device.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

5. Does the report have a column that shows the amount of any variances and a column that shows the variance percent by each machine?

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

6. Does the report reflect all denominations and subtotals by denomination? Does the report reflect grand totals for current, MTD and YTD for all denominations?

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

7. Are percent variances properly calculated (i.e., variance amount divided by the metered amount)? Select one machine and recalculate this variance. Note the machine tested and results.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

**ICMP Compliance Checklist: Section 11, ACCOUNTING**  
**For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

**Legend:**

**C** = In Compliance

**N** = Noncompliance

**2C** = In Compliance at Follow-up

**2N** = Noncompliance at Follow-up

8. Are all variances equaling or exceeding 1% and equaling or exceeding \$10 identified on a drop-by-drop basis? Document the number of variances exceeding the threshold and requiring an investigation, including the machine number and dollar variance amount.
 

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------
  
9. Are variances being investigated and explained, with the explanation documented, on a timely basis? Request a current period report to determine variances are investigated timely in accordance with the accounting plan.
 

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------
  
10. Do the results of the investigation meet the adequate explanation criteria per the ICMP? Review the most recent variance explanation(s) to determine compliance. Document the machine number, variance amount and explanation.
 

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------
  
11. Are variances being reviewed by the accounting personnel to determine reasonableness of the investigation and explanation? Are investigations performed by the Slot Department returned to the Accounting Department timely with in accordance with the Written Accounting Plan? Review the most recent variance investigations from the Slot Department to determine compliance.
 

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------
  
12. Have any variances between the report and the MSRS (should be indicated on the Tax Template) been adequately explained? You must tie the drop amounts from the report to the MSRS for each denomination and in total. Document the amounts per the report, the amounts per the MSRS, the difference between the two reports and the explanation if applicable.
 

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------
  
13. Do all monthly totals on the report trace to the corresponding Tax Template by denomination and in total? Document any differences and the explanation for the difference.
 

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------
  
14. Are there "zeroed out" meters? If so, the Accounting Department must notify the Slot Department to determine the cause of the reset. The licensee must use this information to complete the meter reset form whenever the soft meter(s) are cleared or reset. Document the machine numbers with zeroed out meter(s).
 

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------
  
15. Are adjustments made to meter or actual amounts properly supported and documented? Review the last adjustment and determine compliance. Document the machine number, the pre and post adjusted amounts, and explanation.
 

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

**ICMP Compliance Checklist: Section 11, ACCOUNTING**  
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**Legend:**

**C** = In Compliance

**N** = Noncompliance

**2C** = In Compliance at Follow-up

**2N** = Noncompliance at Follow-up

16. Is the report prepared timely? Did the preparer initial the report? Document the date the report was prepared and the preparer's name.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

17. Was secondary level of review conducted timely? Did the reviewer initial the report? Document the date secondary level of review was conducted and the reviewer's name.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

**ICMP Compliance Checklist: Section 11, ACCOUNTING**  
**For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

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**2N** = Noncompliance at Follow-up

**REVIEW OF SLOT SUPPORTING REPORTS**

**Name of Licensee:** \_\_\_\_\_

**Title of Report:** Supporting Reports

**Reviewer's Initials:** \_\_\_\_\_

**Time Period Reviewed:** \_\_\_\_\_

**BILL DROP BY DENOMINATION REPORT (BILL REPORT)**

1. Does the report reflect the month, year, and licensee's name?

C	N	2C	2N
---	---	----	----

2. Does the report compare metered bill in to actual bills by bill denomination and in total, for each machine?

C	N	2C	2N
---	---	----	----

3. Is the report prepared on a drop by drop basis?

C	N	2C	2N
---	---	----	----

4. Does the report reflect all denominations and subtotals by denomination?

C	N	2C	2N
---	---	----	----

5. Does the report express variances in dollar amounts?

C	N	2C	2N
---	---	----	----

6. Are all currency variances of \$25 or more identified? Document the number of variances exceeding the threshold and requiring an investigation, including the machine number and dollar variance amount.

C	N	2C	2N
---	---	----	----

7. Are variances being investigated and explained, with the explanation documented, on a timely basis? Request a current period report to determine variances are investigated timely in accordance with the accounting plan.

C	N	2C	2N
---	---	----	----

8. Are adjustments made to meter or actual amounts properly supported and documented? Review the last adjustment and determine compliance. Document the machine number, the pre and post adjusted amounts, and explanation.

C	N	2C	2N
---	---	----	----

**DETAIL REPORT**

1. Does the report reflect the date and licensee's name?

C	N	2C	2N
---	---	----	----

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**2N** = Noncompliance at Follow-up

2. Does the report reflect a complete listing of each ticket generated by a TITO device?

C	N	2C	2N
---	---	----	----

3. Does the report reflect each ticket and slot coupon redeemed for the entire gaming day?

C	N	2C	2N
---	---	----	----

4. Does the report include the device number, date, time, validation number, date, time, and the status (issued or redeemed) of the ticket or coupon?

C	N	2C	2N
---	---	----	----

5. Is the report saved on a daily basis?

C	N	2C	2N
---	---	----	----

**TICKETS ISSUED REPORT**

1. Does the report reflect the date and licensee's name?

C	N	2C	2N
---	---	----	----

2. Does the report reflect the dollar amount of each ticket issued by TITO device?

C	N	2C	2N
---	---	----	----

3. Is the report prepared for each drop period?

C	N	2C	2N
---	---	----	----

4. Do the dollar amounts reflected on this report agree by machine, denomination, and in total to the amounts reflected in the actual column on the Ticket Out Report?

C	N	2C	2N
---	---	----	----

5. Was secondary level of review conducted timely? Did the reviewer initial the report? Document the date secondary level of review was conducted and the reviewer's name.

C	N	2C	2N
---	---	----	----

**TICKETS FROM SLOT DEVICE COUNTED BY COUNT TEAM REPORT**

1. Does the report reflect the date and licensee's name?

C	N	2C	2N
---	---	----	----

2. Does the report reflect the dollar value of each ticket and slot coupon counted by the count team? Is the information reflected by TITO device?

C	N	2C	2N
---	---	----	----

3. Does the report reflect a piece and dollar count by machine?

C	N	2C	2N
---	---	----	----

4. Do the amounts on the report agree to the amounts on the Tickets Redeemed by Device Report? Depending on the gaming system utilized, there may be timing differences between these two reports. If this is the case, ensure there is a process for monitoring the timing differences.

C	N	2C	2N
---	---	----	----

**ICMP Compliance Checklist: Section 11, ACCOUNTING**  
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**C** = In Compliance

**N** = Noncompliance

**2C** = In Compliance at Follow-up

**2N** = Noncompliance at Follow-up

5. Do the amounts on this report agree by machine, by denomination, and in total to the amounts reflected in the actual column on the Ticket In Report?

C	N	2C	2N
---	---	----	----

6. Was secondary level of review conducted timely? Did the reviewer initial the report? Document the date secondary level of review was conducted and the reviewer's name.

C	N	2C	2N
---	---	----	----

**TICKETS REDEEMED BY DEVICE REPORT**

1. Does the report reflect the date and licensee's name?

C	N	2C	2N
---	---	----	----

2. Does the report reflect the dollar amount of each ticket and slot coupon redeemed at a TITO device? Is the information reflected by device?

C	N	2C	2N
---	---	----	----

3. Is the report prepared for each drop period?

C	N	2C	2N
---	---	----	----

4. Do the amounts on this report agree to the amounts on the Tickets from Slot Device Counted by Count Team Report? Depending on the gaming system utilized, there may be timing differences between these two reports. If this is the case, ensure there is a process for monitoring the timing differences.

C	N	2C	2N
---	---	----	----

5. Do the amounts on this report agree to the amounts in the actual column on the Ticket In Report?

C	N	2C	2N
---	---	----	----

6. Was secondary level of review conducted timely? Did the reviewer initial the report? Document the date secondary level of review was conducted and the reviewer's name.

C	N	2C	2N
---	---	----	----

**TICKETS REDEEMED BY CASHIER REPORT PRODUCED BY CASHIER:**

1. Does the report reflect the date and licensee's name?

C	N	2C	2N
---	---	----	----

2. Does the report reflect the dollar amount of each ticket and slot coupon redeemed by each cashier at the cashier cage?

C	N	2C	2N
---	---	----	----

3. Is a report printed at the end of each cashier's shift?

C	N	2C	2N
---	---	----	----

**ICMP Compliance Checklist: Section 11, ACCOUNTING**  
**For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

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**2N** = Noncompliance at Follow-up

4. Do the total dollar values of tickets recorded on the Daily Cash Summaries agree to this report?

C	N	2C	2N
---	---	----	----

5. Was secondary level of review conducted timely? Did the reviewer initial the report? Document the date secondary level of review was conducted and the reviewer's name.

C	N	2C	2N
---	---	----	----

**TICKETS UNREDEEMED REPORT**

1. Does the report reflect the date and licensee's name?

C	N	2C	2N
---	---	----	----

2. Does the report provide a listing by TITO device number, the date, time, validation number, and dollar amount of each active (i.e., unredeemed) ticket?

C	N	2C	2N
---	---	----	----

3. Was secondary level of review conducted timely? Did the reviewer initial the report? Document the date secondary level of review was conducted and the reviewer's name.

C	N	2C	2N
---	---	----	----

**TICKETS REDEEMED BY ISSUING MACHINE REPORT**

1. Does the report reflect the date and licensee's name?

C	N	2C	2N
---	---	----	----

2. Does the report reflect the dollar amount of each ticket redeemed, listed by issuing TITO device.

C	N	2C	2N
---	---	----	----

3. Is the report prepared for each drop period?

C	N	2C	2N
---	---	----	----

4. Do dollar amounts reflected on this report agree by denomination and in total to the amounts reflected in the tickets redeemed by issued column on the MSRS?

C	N	2C	2N
---	---	----	----

5. Was secondary level of review conducted timely? Did the reviewer initial the report? Document the date secondary level of review was conducted and the reviewer's name.

C	N	2C	2N
---	---	----	----

**TICKETS FROM KIOSK COUNTED BY THE COUNT TEAM REPORT**

1. Does the report reflect the date and licensee's name?

C	N	2C	2N
---	---	----	----

2. Does the report reflect the tickets and slot coupons redeemed in a kiosk and counted by the count team?

C	N	2C	2N
---	---	----	----

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**2N** = Noncompliance at Follow-up

- |   |   |   |    |    |
|---|---|---|----|----|
| 3. Does the report reflect a piece and dollar count by kiosk?   | C | N | 2C | 2N |
| 4. Does the report agree to the Tickets Redeemed by Kiosk Report? Depending on the gaming system utilized, there may be timing differences between these two reports. If this is the case, ensure there is a process for monitoring the timing differences. | C | N | 2C | 2N |
| 5. Was secondary level of review conducted timely? Did the reviewer initial the report? Document the date secondary level of review was conducted and the reviewer's name.  | C | N | 2C | 2N |

**TICKETS REDEEMED BY KIOSK REPORT**

- |  |   |   |    |    |
|--|---|---|----|----|
| 1. Does the report reflect the date and licensee's name?   | C | N | 2C | 2N |
| 2. Does the report reflect the dollar amount of each ticket and slot coupon redeemed at a ticket redemption kiosk?   | C | N | 2C | 2N |
| 3. Is the report prepared in conjunction with each kiosk drop/count?   | C | N | 2C | 2N |
| 4. Do the amounts on the report agree to the Tickets from Kiosk Counted by the Count Team Report and the report generated by the kiosk? Depending on the gaming system utilized, there may be differences between these three reports. If this is the case, ensure there is a process for monitoring the timing differences. | C | N | 2C | 2N |
| 5. Was secondary level of review conducted timely? Did the reviewer initial the report? Document the date secondary level of review was conducted and the reviewer's name.   | C | N | 2C | 2N |

**EPCS PLAYER ACTIVITY REPORT**

- |  |   |   |    |    |
|--|---|---|----|----|
| 1. Does the report reflect the date and licensee's name?   | C | N | 2C | 2N |
| 2. Does this report provide a summary of all players' activity of CEP-In, NCEP-In or NCEP-Out by gaming device, by denomination and grand total? | C | N | 2C | 2N |
| 3. Does this report tie to the EPCS activity as shown on the CEP-In, NCEP-In or NCEP-Out statistical reports?                                    | C | N | 2C | 2N |

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4. Does this report tie to the EPCS electronic promotional activity as shown on the CEP-In, NCEP-In or NCEP-Out statistical reports?

C	N	2C	2N
---	---	----	----

5. Was the report prepared for each drop period?

C	N	2C	2N
---	---	----	----

6. Instead of 2 – 4 above, does the EPCS Machine Activity Report grand total tie to the EPCS Player Activity Report? Do the EPCS Machine Activity Report and EPCS Player Activity Report tie to the CEP-In, NCEP-In and/or NCEP-Out statistical Reports?

C	N	2C	2N
---	---	----	----

7. Was secondary level of review conducted timely? Did the reviewer initial the report? Document the date secondary level of review was conducted and the reviewer's name.

C	N	2C	2N
---	---	----	----

**EPCS MACHINE ACTIVITY REPORT**

1. Does the report reflect the date and licensee's name?

C	N	2C	2N
---	---	----	----

2. Does this report provide a summary of the gaming activity of CEP-In, NCEP-In or NCEP-Out by gaming device, by denomination and grand total?

C	N	2C	2N
---	---	----	----

3. Does this report tie to the EPCS activity as shown on the CEP-In, NCEP-In or NCEP-Out statistical reports?

C	N	2C	2N
---	---	----	----

4. Does this report tie to the EPCS electronic promotional activity as shown on the CEP-In, NCEP-In or NCEP-Out statistical reports?

C	N	2C	2N
---	---	----	----

5. Was the report prepared for each drop period?

C	N	2C	2N
---	---	----	----

6. Was secondary level of review conducted timely? Did the reviewer initial the report? Document the date secondary level of review was conducted and the reviewer's name.

C	N	2C	2N
---	---	----	----

**EPCS DETAIL REPORT**

1. Does the report reflect the date and licensee's name?

C	N	2C	2N
---	---	----	----

2. Does this report detail all cashable and non-cashable electronic promotional activity from the EPCS?

C	N	2C	2N
---	---	----	----

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3. Was secondary level of review conducted timely? Did the reviewer initial the report?  
 Document the date secondary level of review was conducted and the reviewer's name.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

**EPCS CREDITS ISSUED AND EXPIRED REPORT**

1. Does the report reflect the date and licensee's name?

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

2. Does this report list all cashable and non-cashable promotional credits that were earned and downloaded to the game, or earned and not downloaded to the game and have since expired?

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

3. Was the report prepared for each drop period?

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

4. Was secondary level of review conducted timely? Did the reviewer initial the report?  
 Document the date secondary level of review was conducted and the reviewer's name.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

**ALL REPORTS**

1. For all the supporting reports, is at least the first and final pages of the report printed and do these pages contain all of the required data per the supporting reports requirements?

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

2. Do the reports that are affected by slot coupons either have a separate column that segregates the slot coupons from the tickets or are two separate reports prepared? One of the reports is for tickets and the other report is for slot coupons.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

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**REVIEW OF STATISTICAL REPORTS**

**Name of Licensee:** \_\_\_\_\_ **Title of Report:** Master Games  
Summary Report

**Reviewer's Initials:** \_\_\_\_\_ **Time Period Reviewed:** \_\_\_\_\_

1. Does the report reflect the month, year, and licensee's name?
 

C	N	2C	2N
---	---	----	----
  
2. Does the report include closers, drops, credits, openers, hand paid jackpots (if applicable), fills, & AGP for all blackjack, craps, roulette and poker tables for each day of the month? (NOTE: If not shown for each day, tables may have been closed on certain days. Check and verify this.)
 

C	N	2C	2N
---	---	----	----
  
3. If the licensee has player banked poker tables, does the report include poker rake, poker jackpot rake, and player-banked poker AGP?
 

C	N	2C	2N
---	---	----	----
  
4. Using the monthly grand totals, does the monthly AGP recalculate correctly? Document grand totals and results.
 

C	N	2C	2N
---	---	----	----
  
5. Do monthly drop, fills/credits, and AGP for blackjack, craps, roulette and poker agree to the Tax Return (should be indicated on the Tax Template)? Document the month tested and AGP for blackjack, craps, roulette and poker.
 

C	N	2C	2N
---	---	----	----
  
6. Are any variances between this report and Tax Return adequately explained? Document any differences and the explanation for the difference.
 

C	N	2C	2N
---	---	----	----
  
7. Do the monthly total amounts on this report agree with the amounts on the Tax Template? Trace each amount on the report to the Tax Template. Document any differences and the explanation for the difference.
 

C	N	2C	2N
---	---	----	----
  
8. Is the report prepared timely? Did the preparer initial the report? Document the date the report was prepared and the preparer's name.
 

C	N	2C	2N
---	---	----	----
  
9. Was secondary level of review conducted timely? Did the reviewer initial the report? Document the date secondary level of review was conducted and the reviewer's name.
 

C	N	2C	2N
---	---	----	----

**ICMP Compliance Checklist: Section 11, ACCOUNTING**  
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**REVIEW OF STATISTICAL REPORTS**

**Name of Licensee:** \_\_\_\_\_

**Title of Report:** Table Games Statistical Reports

**Reviewer's Initials:** \_\_\_\_\_

**Time Period Reviewed:** \_\_\_\_\_

1. Does the report reflect the month, year, and licensee's name?

C	N	2C	2N
---	---	----	----

2. Does the report include current month drop, AGP, and hold percentages for each table by shift? (NOTE: This information may be presented in separate reports, one for blackjack, one for craps, one for roulette, and one for poker.)

C	N	2C	2N
---	---	----	----

3. Does the report include grand totals?

C	N	2C	2N
---	---	----	----

4. Can hold percentages be recalculated as AGP divided by drop? Select one hold percentage and recalculate the hold percentage. Document the table tested and the results.

C	N	2C	2N
---	---	----	----

5. Does the report include expected hold by table game type and a variance column? Does the variance column represent the percent variance between the current month hold percentage compared to the expected hold percentage by table game type? Recalculate this variance for at least one table game type. Document the table game type tested and the results.

C	N	2C	2N
---	---	----	----

6. Is the type of game played identified for each table?

C	N	2C	2N
---	---	----	----

7. Are all table game type hold variances equal to or greater than +/-5% from the table game type expected hold percentage identified? Document the number of variances exceeding the threshold and requiring an investigation, including the table game type and variance amount.

C	N	2C	2N
---	---	----	----

8. Are variances being reviewed, investigated and explained, with the explanation documented, on a timely basis? Request a current period report to determine variances are investigated timely in accordance with the Written Accounting Plan.

C	N	2C	2N
---	---	----	----

9. Do the results of the investigation meet the adequate explanation criteria per the ICMP? Review the most recent variance explanation to determine compliance. Document the table number, variance amount and explanation.

C	N	2C	2N
---	---	----	----

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10. Are variances being reviewed by the accounting personnel to determine reasonableness of the investigation and explanation? Are investigations performed by the Table Games Department returned to the Accounting Department timely with in accordance with the Written Accounting Plan? Review the most recent variance investigations from the Table Games Department to determine compliance.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

11. Does the current MTD drop and AGP amounts trace to the Master Games Summary Report (should be indicated on the Tax Template)? Each amount on the tax template must be traced to the respective statistical report.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

12. Is the report prepared timely? Note the date the report was prepared.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

13. Was secondary level of review conducted timely? Did the reviewer initial the report? Note the date secondary level of review was conducted.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

**Additional Comments:**

<b>Review Recap</b>		
	<i>Initial Review</i>	<i>Follow-up</i>
(1) Total items tested	_____	_____
(2) Total noncompliance items	_____	_____

ICMP Compliance Checklist: Section 13, SURVEILLANCE SYSTEM  
For Use by Division of Gaming and Independent Compliance Officers (ICOs)

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Licensee Name	Review Recap		
Prepared By			
Period reviewed (ICO Use Only)	(1) Total sections checked	Initial Review	Follow-up
Date & Time Completed			
Date Follow-up Performed		(2) Sections non-compliant	

Division of gaming use only	
Employee Name & License #	
Casino Manager & License #	

ICMP – SURVEILLANCE SYSTEM STANDARDS – A. GENERAL

C

N

1. Each casino must have a surveillance room in-house. Exceptions would only be for commonly owned casinos, which are within the same County. The surveillance room must be within one of the commonly owned casinos.
  - 1.1. Does the surveillance room share the surveillance system with a sister casino? \_\_\_ Yes \_\_\_ No
2. All personnel installing, cleaning, maintaining and repairing surveillance equipment on site must be licensed by the Division of Gaming.
  - 2.1. Does the casino allow any non-licensed personnel to perform any of the above functions? \_\_\_ Yes \_\_\_ No
  - 2.2. Do all surveillance officers have their licenses on their person or within the room? \_\_\_ N/A \_\_\_ Yes \_\_\_ No
3. The time displayed on the surveillance system must be within 30 seconds of [www.time.gov](http://www.time.gov) or the surveillance system's time must be synced to the same source that the licensee utilizes for its gaming system. A date/time must be imbedded on all recordings of gaming areas. The date and time must be synchronized and set correctly and must not significantly obscure the picture.
  - 3.1. Is the date/time imbedded on all recordings of the gaming area? \_\_\_ Yes \_\_\_ No  
*[For Example: Randomly check 10% of the recorded images to verify that a date/time stamp is present.]*
  - 3.2. Is the live date/time synchronized and set correctly? \_\_\_ Yes \_\_\_ No
  - 3.3. Is the recorded date/time synchronized set correctly? \_\_\_ Yes \_\_\_ No  
*[For Example: Randomly verify that 10% of the recorded images the current date/time is synchronized with [www.time.gov](http://www.time.gov); within 30 seconds.]*
  - 3.4. Is the imbedded date/time placed in a manner which does not significantly obscure the main focus of the image? \_\_\_ Yes \_\_\_ No
4. Licensees are responsible for ensuring all surveillance equipment is properly functioning and the playback quality meets Division requirements.
  - 4.1. Does the equipment appear to be in good working order? \_\_\_ N/A \_\_\_ Yes \_\_\_ No
  - 4.2. Does the equipment appear to be clean and maintained? \_\_\_ N/A \_\_\_ Yes \_\_\_ No
5. The licensee must have all documentation, approvals, and variances, or copies thereof, relating to surveillance, kept in the surveillance room and available upon request.

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5.1. Are all approvals and variances available for inspection? ☐ N/A ☐ Yes ☐ No

6. Licensees are responsible for training licensed surveillance employees in game protection, the play of all games, the odds payouts of table games, investigations, the use of its surveillance system and in creating a download for evidentiary purposes.

6.1. Can the licensee create a download for evidentiary purposes? ☐ N/A ☐ Yes ☐ No

*[For Example: Have the operators create a one-minute video on a USB in AVE and MPEG formats.]*

**ICMP – SURVEILLANCE SYSTEM STANDARDS - C. EQUIPMENT**

<b>C</b>	<b>N</b>
----------	----------

1. All cameras must meet or exceed the requirements set within the applicable sections.

1.1. Are all table games cameras digital? ☐ Yes ☐ No

2. All PTZ cameras must be 360 degree functional in gaming areas and must be enclosed in a shaded housing, so that it is hidden from view. All PTZ cameras that are required by the Division shall be digital color PTZ cameras.

2.1. Do all of the PTZ cameras in the gaming area pan 360 degrees? ☐ Yes ☐ No

*[For Example: Check all of the PTZ cameras in the gaming area will pan, tilt and zoom appropriately.]*

2.2. Are the PTZ cameras enclosed in a shaded housing or dome? ☐ Yes ☐ No

*[For Example: Randomly verify that the PTZ cameras in the gaming area are enclosed in a shaded housing or dome.]*

2.3. Is the direction that the PTZ camera is facing, concealed from view? ☐ Yes ☐ No

3. Auto iris lenses are acceptable, if they are properly adjusted at all times. However, manual iris lenses, or auto iris lenses with a manual override, are required for PTZ cameras.

3.1. Does the licensee utilize Auto Iris lenses on their fixed cameras? ☐ Yes ☐ No

3.2. Are the Auto Iris lenses properly adjusted? ☐ N/A ☐ Yes ☐ No

3.3. Do the Pan/Tilt/Zoom cameras have a manual iris lens or an auto iris lens with a manual override? ☐ Yes ☐ No

*[For Example: Randomly choose 10% of the properties PTZ cameras and verify that the iris can be manually opened & closed]*

4. At least one digital monitor in the surveillance room is required with the capability of displaying any camera (live or playback) in a 23-inch or greater viewable area, not to include the system controls. Licensees with 500 or more devices will provide a separate monitor station for reviews that does not interfere with normal operations.

4.1. Does the licensee have the required monitor? ☐ Yes ☐ No

4.2. If the licensee has 500 or more devices, is a separate review station, which does not interfere with normal operations provided? ☐ N/A ☐ Yes ☐ No

5. All work stations must be capable of video review in forward, reverse, slow motion, and frame-by-frame.

5.1. Do all work stations conform to this ICMP? ☐ Yes ☐ No

6. The licensee must have a failure notification system that provides notification of any recording system failure within 15 minutes. All recording failures must be addressed within one hour of system notification.

*[For Example: Have the licensee simulate a failure of the surveillance system by unplugging an input(s) to a piece of the recording equipment.]*

6.1. Does the system provide a visual alarm within fifteen minutes of the failure? ☐ Yes ☐ No

6.2. Does the system provide an audible alert within fifteen minutes of the failure? ☐ Yes ☐ No

Revised September 2022

Effective November 2022

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- 6.3. Does the licensee have procedures in place to address the failure notification within 1 hour? ☐ Yes ☐ No  
*[For Example: Check the surveillance rooms SOP when there is a failure.]*
7. All recordings must be erased or destroyed prior to disposal, sale to another licensee or manufacturer, or when discarded by any other means.
- 7.1. Review the licensee's procedures to ensure that all recordings, to include discs, tapes, DVR's and hard drives are being erased or destroyed properly ☐ Yes ☐ No
8. If the surveillance room does not have the capability to deliver a clear still photo of a camera image through email, then one color capable video printer is required in the surveillance room.  
*[For Example: Randomly choose three cameras, have the licensee produce a live still photograph and a still photograph of the same image on playback.]*
- 8.1. Did the surveillance room have the capability to email a clear photo? ☐ Yes ☐ No  
*[For Example: Have the surveillance room email the Investigator a photo.]*
- 8.2. If the system cannot email a photo, is there a printer in the surveillance room? ☐ Yes ☐ No
- 8.3. Did the system immediately produce the still images off of playback? ☐ Yes ☐ No
- 8.4. Was the playback still images clear? ☐ Yes ☐ No

**ICMP – SURVEILLANCE SYSTEM STANDARDS – D. CASHIER CAGES, KENO WRITER STATIONS, VAULTS, COUNT ROOMS, ELEVATORS AND KIOSKS**

**C**

**N**

1. In count rooms, cages, and vaults, cameras must be positioned so that all areas in the room are covered to include but not limited to, access points to and from the underside of desks and counters, storage areas, and to the highest area where an item can be stored. Video surveillance must cover all areas where chips, tokens, cash and other cash equivalents are stored. Count room, vaults, cashier cages must have room lighting that is hard wired. There must be no ability to turn off the lights from inside the room or near the doors.
- 1.1. Count Room(s)  
 In the count room, stationary cameras must provide a close up, unobstructed view of the cash/coin counting table where the actual count takes place. During the count, the count team members, whether removing monies from the bucket or box, counting, sorting, verifying or storing, must not obstruct the camera view of the monies.
- The location where monies are set aside, until the end of the count and cashier verification, must be recorded by surveillance cameras that are located close enough to the monies to identify individuals accessing the funds, ensure the monies are clearly distinguishable, and can differentiate between money and other paper.
- 1.1.1. Is there an unobstructed close up view of the counting table while the count is on-going? ☐ Yes ☐ No  
*[For Example: Review coverage of the previous drop period to ensure that the count team members are not able to obstruct the coverage of the room and count tables.]*
- 1.1.2. Do the count team members obstruct the camera view of the monies? ☐ Yes ☐ No  
*[For Example: Review coverage of the previous drop period to ensure that the count team members are not able to obstruct the coverage of the room and count tables.]*
- 1.1.3. Are the monies clearly distinguishable from other papers? ☐ Yes ☐ No  
*[For Example: Review coverage of the previous drop period to ensure that monies are clearly distinguishable from other papers.]*
- 1.2. Cashier Cage(s)  
 In the cashier's cage, stationary cameras must provide a close up view of the cash/coin, slot coupon and ticket transactions. Transaction areas must be clearly marked on the counter so that cashiers know where to place currency and documents.

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Transaction cameras covering this area must be able to differentiate between bill denomination, slot coupon value, ticket value, and chip value, check value and read the driver's license of the person making a transaction which requires a driver's license or personal identification.

Designated cameras must view the full face of patrons and employees making transactions with sufficient clarity to identify them at all cage windows on playback.

The location where monies are set aside, until the end of the count and cashier verification, must be recorded by surveillance cameras that are located close enough to the monies to identify individuals accessing the funds, ensure the monies are clearly distinguishable, and can differentiate between money and other papers.

- 1.2.1. Is there a close-up stationary camera view of each transaction area? \_\_\_Yes \_\_\_No
- 1.2.2. Are the transaction areas clearly marked on the counter? \_\_\_Yes \_\_\_No
- 1.2.3. Are you able to differentiate between bill denominations? \_\_\_Yes \_\_\_No
- 1.2.4. Are you able to differentiate between slot coupon values? \_\_\_Yes \_\_\_No
- 1.2.5. Are you able to differentiate between ticket values? \_\_\_Yes \_\_\_No
- 1.2.6. Are you able to differentiate between chip values? \_\_\_Yes \_\_\_No
- 1.2.7. Are you able to read a driver's license within the transaction square that is being utilized for check cashing?  
[Check the transaction window on playback.] \_\_\_Yes \_\_\_No
- 1.2.8. Are the locations where monies are set aside for the count and cashier verification covered properly?  
[Check all locations where monies are set aside while the verification is taking place.] \_\_\_Yes \_\_\_No
- 1.2.9. Are there designated cameras that provide full facial coverage of all patrons and employees with sufficient clarity to identify them at all cage windows on playback?  
[For Example: Review coverage of a particular window to ensure that the quality is sufficient to identify an individual.] \_\_\_Yes \_\_\_No
- 1.2.10. Are the cameras positioned so that all areas in the room are covered? \_\_\_Yes \_\_\_No
- 1.2.11. Are access points to and from the underside of desks and counters covered? \_\_\_Yes \_\_\_No
- 1.2.12. Does the coverage include to the highest point in which items can be stored? \_\_\_Yes \_\_\_No

**1.3. Vault(s)**

- 1.3.1. Are the cameras positioned so that all areas in the room are covered? \_\_\_Yes \_\_\_No
- 1.3.2. Are access points to and from the underside of desks and counters covered? \_\_\_Yes \_\_\_No
- 1.3.3. Does the coverage include to the highest point in which items can be stored? \_\_\_Yes \_\_\_No

**1.4. Elevators**

Elevators used for transporting drops, fills, credits, jackpots, and gaming monies must have adequate surveillance coverage for the protection of assets, inside the elevator and at each opening on the floors. Dumb waiters need not have surveillance inside, but must still have surveillance at each opening on the floors.

- 1.4.1. Does each elevator that the licensee utilizes to transport gaming funds have internal stationary camera that provides an adequate view of the inside of the elevator? \_\_\_Yes \_\_\_No
- 1.4.2. Is there adequate coverage on each floor that the elevator(s) can potentially stop on? \_\_\_Yes \_\_\_No
- 1.4.3. If the licensee utilizes 'dumb waiters' to transport gaming funds, is there adequate coverage on each floor that the dumb waiter(s) can potentially stop on? \_\_\_Yes \_\_\_No

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**1.5. Kiosks**

All cash transaction devices which are an extension of the cage, such as a kiosk or other type of device that redeems gaming tickets, slot coupons, or exchange coins, bills, or tokens shall have adequate surveillance coverage for the protection of assets. Identification of person(s) using the device must include a view of at least one half of the person's face and close enough to identify the person using the device. Stand-alone ATM machines are exempt from this requirement.

1.5.1. Do such devices have adequate coverage to view the immediate area? ☐ Yes ☐ No

1.5.2. Can you view at least one half of a person's face close enough to identify that person? ☐ Yes ☐ No

**2. Restricted key boxes, duplicate key boxes, an automated key tracking system and any other key lock system must be under surveillance.**

2.1. Are the restricted key boxes under surveillance? ☐ Yes ☐ No

2.2. Are the duplicate key boxes under surveillance? ☐ Yes ☐ No

2.3. Are the automated key tracking systems under surveillance? ☐ N/A ☐ Yes ☐ No

2.4. Are all other key lock systems under surveillance? ☐ N/A ☐ Yes ☐ No

**3. Internal hallways to and from Count, Vault, and Cashier Rooms must have adequate surveillance coverage for the protection of assets.**

3.1. Does the surveillance coverage of the hallways to and from the count room provide an adequate view of activities in the immediate areas? ☐ Yes ☐ No

3.2. Does the surveillance coverage of the hallways to and from the vault provide an adequate view of activities in the immediate areas? ☐ N/A ☐ Yes ☐ No

3.3. Does the surveillance coverage of the hallways to and from the cashier rooms provide an adequate view of activities in the immediate areas? ☐ Yes ☐ No

**4. All pouch pay, pouch bank, or change pouch, as well as their storage cabinets, lockers, or racks, etc., shall have adequate surveillance coverage at all times for the protection of assets.**

4.1. Does the licensee restrict all pouch pay, pouch banks and change pouches to areas in which there is adequate surveillance coverage of the immediate area(s)? ☐ Yes ☐ No

4.2. Do all of the storage area(s) have adequate coverage of the immediate area(s)? ☐ Yes ☐ No

**ICMP – SURVEILLANCE SYTEM STANDARDS - E. TABLE GAMES**

<b>N/A</b>	<b>C</b>	<b>N</b>
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Licensees may use either stationary cameras, PTZ cameras, or a combination of both to meet the following requirements.

**1. Coverage of table games must be able to view the patron and/or dealers face, cards, chips, tokens, cash, shufflers and play areas of each table. Cameras must be able to distinguish card values on the normal setup and playback. Any electronic table capable of game recall is not required to have coverage that reads individual card values or suits. Table games linked to a progressive jackpot must have stationary camera coverage of the access to the progressive controller computer. A person's face at a gaming table is defined as the ability to view at least one half of the patrons and or the dealer's face. Surveillance video must be able to view and record all error indicators on all shufflers being used on all table games.**

1.1. Utilizing PTZ Cameras are you able to...

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- 1.1.1. ...view the patron's face for each table? ☐ Yes ☐ No
- 1.1.2. ...view the cards and distinguish card values for each table? ☐ Yes ☐ No
- 1.1.3. ...view the chips, tokens, cash, shufflers in play or use at each table? ☐ Yes ☐ No
- 1.1.4. ...view the play area of each table? ☐ Yes ☐ No
- 1.2. Any electronic table capable of game recall is not required to have coverage that reads individual card vales or suits.
- 1.2.1. Does the licensee have electronic tables? ☐ Yes ☐ No
- 1.3. Table games linked to a progressive jackpot must have stationary camera coverage of the access to the progressive controller computer.
- 1.3.1. Does the licensee have tables that are linked to a progressive controller? ☐ Yes ☐ No
- 1.3.2. Is the progressive controller adequately covered by a stationary camera? ☐ N/A ☐ Yes ☐ No
2. During the course of play on any table game, the dealer must not obstruct the camera view of the table tray, drop slot, or tip box.
- 2.1. Does the dealer obstruct the cameras view of the table tray, drop slot or tip box? ☐ Yes ☐ No  
 [For Example: Watch each table from the dedicated stationary camera to determine if the camera is positioned in an effort to prevent obstruction.]
3. The soft drop route must be under stationary or PTZ camera surveillance.
- 3.1. Does the coverage of the soft drop route adequately cover the immediate area? ☐ Yes ☐ No  
 [Review several of the cameras from the most recent soft drop.]
- All Blackjack, House Banked Poker, Baccarat, Big 6 Wheel, or other Variation Games:**
4. All Gaming tables within this section must have stationary digital camera coverage. Cameras must be positioned to provide an overview of the entire table, outside bumper to outside bumper, including the table tray, drop slot, toke tube, and an automated shuffler if applicable while the game is in play. Stationary cameras must be able to distinguish all chip, cash, card, tickets, and total values of wagers on the normal setup and playback.
- 4.1. Does each table have digital stationary camera coverage? ☐ Yes ☐ No
- 4.2. Are the cameras positioned to provide the following, while the game is in play:
- 4.2.1. An overview of the whole table, outside bumper to outside bumper? ☐ Yes ☐ No
- 4.2.2. The table tray, drop slot and tip box? ☐ Yes ☐ No
- 4.3. Does the coverage allow for all chips, cash, card, ticket and total values of wagers to be distinguished on:
- 4.3.1. Live view? ☐ Yes ☐ No
- 4.3.2. Playback of recorded video? ☐ Yes ☐ No
- House Banked Poker Tables:**
5. Surveillance coverage is required to read suits and differentiate between chip/token cash, ticket and total wager values on playback. Surveillance coverage must also provide a view of the table tray, tip box, toke tubes, automated shuffler, and must cover the entire table, which includes outside bumper to outside bumper. All poker imprest banks, which are the point of chip and cash transactions for the poker tables, must have the same camera coverage as that of a cashier's cage.
- 5.1. Does each table have stationary digital camera coverage? ☐ Yes ☐ No
- 5.2. Are the cameras positioned to provide the following, while the game is in play:
- 5.2.1. An overview of the whole table, outside bumper to outside bumper? ☐ Yes ☐ No
- 5.2.2. The table tray, drop slot and tip box? ☐ Yes ☐ No

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5.3. Does the coverage allow for all chips, cash, card, ticket and total wager values, including suits, to be distinguished on:

5.3.1. Live view? \_\_\_Yes \_\_\_No

5.3.2. Playback of recorded video? \_\_\_Yes \_\_\_No

5.4. Does the poker imprest bank have the same camera coverage as a cashier cage? \_\_\_Yes \_\_\_No

**Big 6 Wheel tables:**

6. Cameras must be positioned to provide an overview of the entire table, outside bumper to outside bumper, including the table tray, drop slot, and the wheel, while the game is in play. Stationary cameras must be able to distinguish all chip, cash, card, ticket values, and total wagers on the normal setup and playback. All Big 6 Wheel games shall have one [1] dedicated camera viewing the Big Wheel.

6.1. Does the casino have Big 6 Wheel in their pit? (Not Stadium Seating) \_\_\_Yes \_\_\_No

6.2. Does each table have stationary digital camera coverage? \_\_\_Yes \_\_\_No

6.3. Are the cameras positioned to provide the following, while the game is in play:

6.3.1. An overview of the entire table, outside bumper to outside bumper? \_\_\_Yes \_\_\_No

6.3.2. The table ray, drop slot and tip box and the wheel while the game is in play? \_\_\_Yes \_\_\_No

6.4. Does the coverage allow for all chips, cash, card, ticket and total wager values? \_\_\_Yes \_\_\_No

6.4.1. Live view? \_\_\_Yes \_\_\_No

6.4.2. Playback of recorded video? \_\_\_Yes \_\_\_No

**Pai Gow Tiles:**

7. All Pai Gow Tiles tables must have stationary digital camera coverage. Cameras must be positioned to provide an overview of the entire table, outside bumper to outside bumper, the table trays, drop slots, tip boxes, toke tubes, tile value, and determine the value of any and all wagers made, tips received and dropped, live and on playback.

7.1. Does each table have stationary digital camera coverage? \_\_\_Yes \_\_\_No

7.2. Are the cameras positioned to provide the following, while the game is in play:

7.2.1. An overview of the entire table, outside bumper to outside bumper? \_\_\_Yes \_\_\_No

7.2.2. The table tray, drop slot and tip box? \_\_\_Yes \_\_\_No

7.3. Does the coverage allow for all chips, cash, card, ticket and total wager values, including suits, to be distinguished on:

7.3.1. Live view? \_\_\_Yes \_\_\_No

7.3.2. Playback of recorded video? \_\_\_Yes \_\_\_No

7.3.3.

**Poker:**

8. All player banked poker tables must have stationary digital camera coverage that includes the table tray, rake slide, jackpot drop area, tip box, muck cards, shuffling device, and the wagering pot. Surveillance coverage must be able to distinguish the suits of the community cards and the winning hand on playback. Surveillance coverage must also view the entire poker table, which includes the back of chair to the back of chair.

8.1. Does each table have stationary digital camera coverage? \_\_\_Yes \_\_\_No

8.2. Are the cameras positioned to provide the following, while the game is in play:

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- 8.2.1. An overview of the whole table, back of chair to back of chair? ☐ Yes ☐ No
- 8.2.2. The table tray, rake slide, jackpot drop area, tip box, muck cards and the wagering pot? ☐ Yes ☐ No
- 8.3. Does the coverage allow for distinguishing the suits of the community cards and winning hand:
- 8.3.1. Live view? ☐ Yes ☐ No
- 8.3.2. Playback of recorded video? ☐ Yes ☐ No
- 8.4. All poker table tray storage cabinets, lockers, or racks, table games validation units, etc., shall have adequate surveillance coverage for the protection of assets.
- 8.4.1. Is there adequate coverage of immediate area in which the table trays are stored? ☐ N/A ☐ Yes ☐ No
- 8.5. All poker imprest banks, which are the point of chip and cash transactions for the poker tables, must have the same camera coverage as that of a cashier's cage.
- 8.5.1. Does the camera coverage over the poker imprest banks meet ICMP requirements? ☐ Yes ☐ No

**Roulette:**

9. All roulette tables must have a minimum of one stationary digital camera. The cameras must be positioned to provide an overview of the entire table, to view the rails which hold chips (if any), the table trays or chip storage area, the drop slots, tip boxes, and be able to determine the value of any and all wagers made, including tips received, live and on playback.
- 9.1. Does each table have stationary digital camera coverage? ☐ Yes ☐ No
- 9.2. Are the cameras positioned to provide the following, while the game is in play:
- 9.2.1. An overview of the entire table, outside rail to outside rail? ☐ Yes ☐ No
- 9.2.2. The table trays, chip storage area, drop slots, tip boxes? ☐ Yes ☐ No
- 9.2.3. Can the value of all wagers and tips received be determined? ☐ Yes ☐ No
- 9.2.4. Can all of the tip values be determined? ☐ Yes ☐ No
- 9.2.5. Live view? ☐ Yes ☐ No
- 9.2.6. Playback of recorded video? ☐ Yes ☐ No
- 9.3. Stationary camera coverage must also cover the wheel, so as to be able to determine the outcome of the game, live and on playback.
- 9.3.1. Is there a digital stationary camera coverage of each wheel? ☐ Yes ☐ No
- 9.3.2. Can you determine the outcome of the game? ☐ Yes ☐ No
- 9.3.3. Live view? ☐ Yes ☐ No
- 9.3.4. Playback of recorded video? ☐ Yes ☐ No

**Craps:**

10. All craps tables must have stationary digital camera coverage. Cameras must be positioned to provide an overview of the entire table, to view the rails which hold chips (if any), the table trays, drop slots, table game validation units, and tip boxes, tips received and dropped, live and on playback.
- 10.1. Does each table have stationary digital camera coverage? ☐ Yes ☐ No

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10.2. Are the cameras positioned to provide the following, while the game is in play:

10.2.1. An overview of the entire table, outside rail to outside rail?

\_\_\_Yes \_\_\_No

10.2.2. Table trays, chip storage area, drop slots, tip boxes, and token tubes?

\_\_\_Yes \_\_\_No

10.2.3. Dice value?

\_\_\_Yes \_\_\_No

10.2.4. Tips received and dropped?

\_\_\_Yes \_\_\_No

**ICMP – SURVEILLANCE SYSTEM STANDARDS - F. SLOT AREAS**

<b>C</b>	<b>N</b>
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1. Licensees may use stationary digital PTZ, fisheye, or 360 cameras, or a combination thereof any to meet the following requirements. Cameras must be positioned so the route of any person walking through the slot gaming area is covered at all times.

1.1. Does the camera coverage allow the route of any person walking through the slot gaming area to be followed?

\_\_\_Yes \_\_\_No

2. All slot machines must be under stationary camera surveillance with sufficient coverage to protect assets. Coverage must include the the access to the progressive controller and the slot machine doors.

Surveillance coverage must also include aisles where hard drops are transported. During the drop, the route must be under coverage. The slot machine surveillance coverage must be able to determine if a person is accessing the slot machine, the drop box, or is playing the slot machine on playback.

2.1. Are all slot machines under station area cameras that includes:

\_\_\_Yes \_\_\_No

2.1.1. the progressive controller access point?

\_\_\_Yes \_\_\_No

2.1.2. slot machine doors?

\_\_\_Yes \_\_\_No

[For Example: Randomly verify that 10% of the licensee's slot banks meet the above]

2.2. Is the drop route under adequate camera coverage, this includes aisles where drop proceeds are transported?

\_\_\_Yes \_\_\_No

2.3. Does the slot machine coverage adequately cover the machine so that it can be determined if a person is accessing the slot machine, the drop box or is playing the slot machine?

\_\_\_Yes \_\_\_No

3. Any multi-linked progressive slot machine offering a payout greater than \$1,000,000 and/or **any** non multi-linked slot machines offering a payout of more than \$500,000 must have coverage of the progressive jackpot liability in addition to the above-required coverage. One camera showing the same liability for multiple banks of the same progressive may be allowed.

3.1. Does the licensee have multi-link progressive slot machines?

\_\_\_Yes \_\_\_No

3.1.1. Is the progressive jackpot liability identifiable on video playback?

\_\_\_Yes \_\_\_No

**ICMP – SURVEILLANCE SYSTEM STANDARDS – G. OTHER STANDARDS**

<b>C</b>	<b>N</b>
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1. All camera views of gaming areas must be continuously recorded 24 hours a day. The use of motion detection is authorized with a five second pre-event recording with Division approval prior to initial use.

1.1. Are all camera views of gaming areas continuously recorded 24 hours a day?

\_\_\_Yes \_\_\_No

1.2. Does the casino utilize motion detection video recording?

\_\_\_Yes \_\_\_No

1.2.1. Has the licensee obtained Division approval to utilize motion recording?

\_\_\_Yes \_\_\_No

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1.2.2. Can the licensee provide the letter for your review? ☐ N/A ☐ Yes ☐ No

1.2.3. Are the cameras that utilize motion detection recording working properly? ☐ N/A ☐ Yes ☐ No

[Randomly verify that the cameras set to record utilizing motion are functioning properly]

2. A complete index and guide to the casino cameras, monitors, and controls must be available in the surveillance room. This guide must include a map of the camera locations, direction of coverage, camera numbers, and operating instructions for the surveillance equipment. In addition, for unmanned surveillance rooms, a complete guide showing the chronological order of the hard and soft drop from start to finish must be available. The guide should have camera numbers and details of the machines covered.

2.1. Is there a map of the camera locations present? ☐ Yes ☐ No

2.1.1. Does this map include directions of coverage? ☐ Yes ☐ No

2.1.2. Camera numbers? ☐ Yes ☐ No

2.2. Are there operating instructions present for the general operation of the system? ☐ Yes ☐ No

2.3. Is the surveillance room unmanned? [If Yes, answer next two questions] ☐ Yes ☐ No

2.3.1. Does the licensee have a complete guide for the hard and soft drop? ☐ Yes ☐ No

2.3.1.1. Does this guide include the chronological order of the cameras, to include camera numbers and details of the machines covered? ☐ Yes ☐ No

3. All surveillance recordings in critical gaming areas must be kept a minimum of 15 days or until gaming document reconciliations have been completed by accounting, whichever is longer, and 10 days for all other gaming areas.

3.1. Does the licensee retain recordings of critical gaming areas for a minimum of 15 days? ☐ Yes ☐ No

[For Example: Randomly verify that the critical coverage is kept for a minimum of 15 days]

3.2. Does the licensee retain recordings of all other gaming areas for a minimum of 10 days? ☐ Yes ☐ No

[For Example: Randomly verify that the all other gaming coverage is kept for a minimum of 10 days]

4. Access to surveillance rooms shall be limited to employees that are essential to surveillance operations, ICO's, casino shift managers, law enforcement agencies, service personnel, and others when approved by the Division. The surveillance room manager has final authority regarding the authorization of access by casino personnel, except when the Division requires or authorizes access. A current list of authorized employees and service personnel that have access to the surveillance room must be posted in the surveillance room.

4.1. Does the licensee maintain a current list of authorized individuals that are approved to access the surveillance room? ☐ Yes ☐ No

5. Each casino must have a surveillance room in-house. Exceptions would only be for commonly owned casinos, which are within the same County. The surveillance room must be within one of the commonly owned casinos. The casino will provide a review station, email capability or printer, map of cameras, and communication in the property that does not house the surveillance room if the casinos are not contiguous. All equipment and security standards in the review station room will meet the minimum criteria set forth by this ICMP section.

5.1. Does the casino in which the surveillance room is not housed have a review station that meets Division standards? ☐ Yes ☐ No

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6. Surveillance rooms must remain locked and must have room for at least two people to view monitors. Licensees that have other functions housed in the surveillance room must receive Division approval. At least one surveillance camera must be in the surveillance room to record any employee who has access to the non-surveillance equipment.
- 6.1. Is the surveillance room kept locked and secured at all times? \_\_\_Yes \_\_\_No
- 6.2. Does the surveillance room have adequate space to allow for two persons to view the monitors? \_\_\_Yes \_\_\_No
- 6.3. Does the licensee have Division approval (written documentation) for any other function that is housed in the surveillance room? \_\_\_Yes \_\_\_No
- 6.3.1. Does the licensee have at least one camera in the surveillance room to adequately cover employees with access to the non-surveillance equipment? \_\_\_Yes \_\_\_No
- 6.3.2. Does the licensee retain video coverage from the surveillance camera for a minimum of 15 days? \_\_\_Yes \_\_\_No
7. Licensees with 500 or more total gaming devices (slot machines and table games) must have manned surveillance rooms during gaming hours, and during the drop and count procedure. Licensees with less than 500 gaming devices but having one or more craps table must have manned surveillance during the hours that any craps table is open for play. If the licensee has a combined surveillance room with a second and or third casino, manned surveillance will be required if the total number of gaming devices between all of the casinos is 500 or more. Each combined surveillance room must be staffed for each individual license in accordance with the above minimum staffing requirements. An authorized person competent in the operation of the surveillance equipment must relieve the surveillance agent/operator for any and all breaks.
- 7.1. How many devices does the licensee have? \_\_\_\_\_
- 7.2. Does the licensee have craps? \_\_\_Yes \_\_\_No
- 7.3. Is the surveillance room properly staff? \_\_\_Yes \_\_\_No
- 7.4. Does the licensee have procedures in place to relieve operators? \_\_\_Yes \_\_\_No
8. Surveillance recordings, to include recordings for evidentiary purposes and clear still photos must be maintained for a minimum of three years and made available to the Division upon request. All Licensee's must be able to provide an AVI or MPEG format of video upon request by the Division of Gaming, Law Enforcement, or the District Attorney's office of the jurisdiction the licensee is in.
- 8.1. Can the operator download a video file in AVI or MPEG formation of archived video? \_\_\_Yes \_\_\_No
- 8.2. Is the casino saving archived video for a minimum of three years? \_\_\_Yes \_\_\_No
9. Manned surveillance rooms must have the ability to immediately send and receive e-mails of still pictures to the Division of Gaming and law enforcement for the purposes of disseminating information of suspects involved in illegal activity. The e-mail account cannot be networked with the surveillance system.
- 9.1. Do surveillance personnel have access to immediately send and receive e-mails? \_\_\_Yes \_\_\_No
- 9.2. Is the email account networked with the surveillance system? \_\_\_Yes \_\_\_No

<b>N/A</b>	<b>C</b>	<b>N</b>
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**ICMP – SURVEILLANCE SYSTEM STANDARDS - H. DIGITAL SURVEILLANCE**

1. Do all digital recording devices record, review and download simultaneously without an interruption of the record mode as required? \_\_\_Yes \_\_\_No

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2. Are Digital recording devices connected to an uninterruptible power source to ensure safe shutdown of the system in the event of a power loss, and does it reboot in the record mode? ☐ Yes ☐ No

3. Does the licensee follow proper procedures regarding table games in the event of a power failure? ☐ Yes ☐ No

When necessary to perform maintenance on digital recording systems, a casino may temporarily take system components offline to perform those functions. If it becomes necessary to take the surveillance system completely offline, the Division of Gaming must be notified, and gaming operations must cease prior to the commencement of the planned maintenance. Maintenance functions would generally be described as rebooting, defragmenting, or other necessary information technology functions necessary to keep the digital surveillance recording system operating properly.

Maintenance functions shall be performed at a time when it is least disruptive to operational functions of the casino and are exempt from the notification requirements of one hour for non-critical coverage loss and the notification requirements of 15 minutes for critical loss. Any other surveillance losses or system component failure shall continue to be reported to the Division of Gaming as required.

4. Does the licensee have a procedure or SOP in place when performing maintenance? ☐ Yes ☐ No

5. Does the licensee provide the Division with the necessary software/hardware to review a proprietary downloaded recording? The media player must be imbedded within the recorded medium and must be capable of review in forward, reverse, slow motion, and frame-by-frame? ☐ Yes ☐ No

6. The licensee is responsible for supplying the below listed mediums for the amount of recorded information being downloaded and transferred to a flash drive, memory stick, USB, or a portable hard drive. VHS or any other video tape, along with CD's DVD's are not an acceptable format for the download or storing of video information required by the Division. All necessary cables, programs, and instructions for use must be supplied with these devices. The licensee must ensure that appropriate policies and controls are in place outlining the device check in/out process. Upon completion of use, the Division will return the equipment to the licensee. The licensee will provide a carrying case for the medium, if applicable.

6.1. Does the licensee have a device check in/out, "Chain of Evidence" policy in place? ☐ Yes ☐ No

6.2. Does the licensee have devices capable of transferring large volume of data for review? ☐ Yes ☐ No

7. An authentication process or watermark will be required to authenticate dates/time and validity of live and archived data. The authentication and/or watermark must be visible on the archived data as a visual verification.

7.1. Is the authentication present? ☐ Yes ☐ No

[For Example: Verify that the authentication process is visible during play back of archived data, on some systems this may require an additional program to view the watermark or authentication]

8. If the licensee uses a network for the digital recording equipment, it must be a closed network with limited access. The licensee must have procedures in place that prevent unauthorized access to the surveillance system.

8.1. Is the digital recording equipment maintained on any other network, other than a dedicated closed surveillance network? ☐ Yes ☐ No

8.2. If the digital recording equipment is maintained on anything other than a dedicated closed surveillance network, does the licensee have written policies on the administration of the network and the employees with access to the network?

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\_\_\_Yes \_\_\_No

9. The licensee may allow remote access to its network for maintenance purposes and within the casino with prior approval by the Division. Written procedures must be submitted to the Division for approval prior to allowing the remote access. The remote access must be on a secure network. Licensees must maintain a manually generated and system generated log that documents system upgrades, modifications, problems, and all remote access.

The system access log must be maintained at all times to include, at a minimum:

Date of remote access;

Reason for the remote access;

Full name, license number & position of person remotely accessing the system;

Description of how the problem was resolved or modification made to the system.

- 9.1. Does the licensee permit remote access to its network? \_\_\_Yes \_\_\_No

- 9.1.1. Does the licensee have written procedures approved by the Division? \_\_\_Yes \_\_\_No

- 9.1.2. The system access log must be maintained at all times to include, at minimum:

- 9.1.2.1. Date of remote access? \_\_\_Yes \_\_\_No

- 9.1.2.2. Reason for the remote access? \_\_\_Yes \_\_\_No

- 9.1.2.3. Full name, license number & position of person remotely accessing the system? \_\_\_Yes \_\_\_No

- 9.1.2.4. Description of how the problem was resolved or modification made to the system? \_\_\_Yes \_\_\_No

10. The system generated log, at a minimum, must include the date, start time, and end time of the access. The report must be printed monthly and traced to the manual log. The Division must be notified, in writing, of any variance between the manual and system log, which must include an explanation for the variance, and a reconstruction of the events that occurred. The system and manual log must be maintained together in the surveillance room and available to the Division upon request.

- 10.1. Does the system generated log contain the necessary information? \_\_\_Yes \_\_\_No

- 10.2. Are the system and manual log maintained together in the surveillance room? \_\_\_Yes \_\_\_No

11. Surveillance room equipment must have total override capability over all other remote access surveillance equipment located outside of the surveillance room.

- 11.1. Does the licensee have remote reviewing capabilities outside of the surveillance room? \_\_\_Yes \_\_\_No

- 11.1.1. Does the surveillance system have override capability over the remote reviewing? \_\_\_Yes \_\_\_No

12. Critical areas, table games, and PTZ cameras covering critical areas and table games will be at a minimum rate of 22 FPS with two fields per frame and must be of sufficient clarity to meet Division requirements. Recording of non-critical areas will be at minimum rate of 7.5 FPS with two fields per frame and must be of sufficient clarity to meet Division requirements.

- 12.1. Critical areas recorded at a minimum frame rate of 22 frames per second? \_\_\_Yes \_\_\_No

[For Example: Randomly choose a critical camera to review. Pause the playback of the camera and advance the recording frame by frame – there should be 22 advancements for every second increment of time.]

- 12.2. Table games recorded at a minimum frame rate of 22 frames per second? \_\_\_Yes \_\_\_No

[For Example: Randomly choose a table game to review. Pause the playback of the camera and advance the recording frame by frame – there should be 22 advancements for every second increment of time.]

**ICMP Compliance Checklist: Section 13, SURVEILLANCE**  
**For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

**Legend:**

**N/A** = Not Applicable

**C** = In Compliance

**N** = Noncompliance

- 12.3. PTZ cameras recorded at a minimum frame rate of 22 frames per second? ☐ Yes ☐ No  
[For Example: Randomly choose a PTZ camera to review. Pause the playback of the camera and advance the recording frame by frame – there should be 22 advancements for every second increment of time.]
- 12.4. All other gaming areas recorded at a minimum frame rate of 7.5 frames per second? ☐ Yes ☐ No  
[For Example: Randomly choose a non-critical gaming camera to review. Pause the playback of the camera and advance the recording frame by frame – there should be 7.5 advancements for every second increment of time.]

**ICMP Compliance Checklist: Section 14, DEALER TIPS**  
**For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

**Legend:**

**C** = In Compliance

**N** = Noncompliance

**2C** = In Compliance at Follow-up

**2N** = Noncompliance at Follow-up

Licensee Name

Prepared By

Period reviewed (ICO Use Only)

Date Completed

Date Follow-up Performed

**ICMP - DEALER TIPS**

1. Section 44-30-820 C.R.S. **Persons in Supervisory positions – unlawful acts - rules.** It is unlawful for a dealer, floorperson, or other employee who serves in a supervisory position to solicit or accept a tip or gratuity from a player or patron at the licensed gaming establishment where he or she is employed; except that a dealer may accept tips or gratuities from a patron at the table at which the dealer is conducting play, subject to this section. Except as the commission may authorize by rule, a dealer shall immediately deposit tips or gratuities in a lockbox reserved for that purpose, accounted for and placed in a pool for distribution based upon criteria established in advance by the licensed retailer. Interview pit personnel to determine compliance with this requirement.

C	N	2C	2N
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2. CGLR 30-428 **Acceptance of Tips (2)** - No gaming employee shall, directly or indirectly, share with, offer, or give tips or gratuities to any gaming employee who is serving in a supervisory capacity. Interview pit personnel to determine compliance with this requirement.

C	N	2C	2N
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**ICMP – DEALER TIPS - A. GENERAL REQUIREMENTS**

1. Tips for dealers may be distributed to dealers on any equitable basis for any reasonable time period, as long as all tips received are reported. Review procedures to determine compliance with this requirement.

C	N	2C	2N
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2. Unless otherwise restricted by the table game per the rule, it is at the licensee's discretion on how to handle tips at each separate table game. The licensee must post its house rule regarding tips and or restrictions on dealer tips if applicable. Ensure the rules are posted if applicable.

C	N	2C	2N
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3. Tips must be accepted at the table and clearly identified by the dealer when received in a manner as intended to draw the attention of the supervisor and immediately deposited into a locked token box at the table. All token boxes must be securely maintained at all times. Dealers may accept a ticket as a tip as long as the table has the ability to issue and redeem tickets at the table. Upon receipt of the ticket, the dealer must immediately notify the pit supervisor, and drop the ticket in the dealer's tip box. The cashier redeems these tickets and exchanges them for currency when counting dealer tips. Interview pit personnel to determine compliance with this requirement.

C	N	2C	2N
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**ICMP Compliance Checklist: Section 14, DEALER TIPS**  
**For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

**Legend:**

**C** = In Compliance

**N** = Noncompliance

**2C** = In Compliance at Follow-up

**2N** = Noncompliance at Follow-up

4. Dealers may receive a tip or gratuity in the form of currency as long as the currency was not used in a wager. When a dealer receives a tip or gratuity in the form of currency the dealer must notify the pit supervisor. The dealer will then, as determined by house policy, either immediately place the tip in the locked token box, or select an equivalent value in chip(s) and immediately place the chip(s) in the locked token box and place the currency into the table drop box. Interview pit personnel to determine compliance with this requirement.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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5. On a craps table, a retail licensee may allow player controlled tip wagers. A player controlled tip wager, once posted, is the dealer's money to be won or lost. Prior to offering player controlled tip wagers, the retail licensee must describe in the Pit Supervision Plan, their house rules detailing how player controlled tip wagers will be handled. Specifically, the retail licensee must address at what point the player controlled tip wager, if won, concludes and when it must be placed into a tip storage device or dropped. Player controlled tip wagers will only be allowed on the craps table if the retail licensee has a seated box-person during the time period that the table is open for play when the player controlled tip wagers are made. Review current processes and procedures to ensure compliance with these requirements.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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6. Tips must be independently counted by two licensed employees, one of whom is independent of pit operations and both employees must be independent of the accounting department. Tips must be counted under surveillance camera. Review surveillance to determine adequate coverage and the presence of the required personnel.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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7. The count must be recorded on the tip/count summary sheet and signed by the two licensed employees performing the count. The tips may be counted by box or may be pooled and counted together. Interview pit personnel to determine compliance with this requirement.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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8. After tips have been counted, but prior to tips being distributed, the tips may be stored either in the cashier's cage or the pit area. However, the tips must always be securely maintained. Determine where tips are stored prior to distribution and ensure they are being securely maintained.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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9. If tips are not distributed by payroll check, tip distribution is documented on the tip distribution sheet. This sheet is completed using information from the tip count/summary sheet. As the licensed employee distributes tips to each dealer, the licensed employee signs the tip distribution sheet next to the dealer's name. As each person receives their tips, they sign the sheet as well. The total tips distributed (tips paid to dealers and tips paid to other employees) must equal the total tips counted on the tip count/summary sheet. Review procedures to determine compliance with this requirement.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**ICMP Compliance Checklist: Section 14, DEALER TIPS**  
**For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

**Legend:**

**C** = In Compliance

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**2C** = In Compliance at Follow-up

**2N** = Noncompliance at Follow-up

10. The tip distribution sheet is forwarded to, and retained by, the casino's accounting department and reconciled to the tip count/summary sheet received from the cage. Review a tip distribution sheet for proper completion and required signatures. Review a reconciliation for proper completion.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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11. All amounts distributed to dealers during a payroll period **are** included in that dealer's wages which are subject to withholding for that period. Review the licensee's policy to determine compliance with this requirement.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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12. Total tips per the tip count/summary sheet and the tip distribution sheet for the payroll period are reconciled to the tips included in wages for that period. The accounting department retains this reconciliation. Review a reconciliation for compliance with the requirement.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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13. Total dealer tips may be reduced by tips paid to other casino employees (i.e., cashiers, waitpersons, etc.) provided these tips are accounted for by the accounting and payroll departments. Tips paid out to other casino employees must be documented on the tip distribution sheet. Review the most recent tip distribution sheets and ensure tips were distributed properly and payroll documentation agrees to what was distributed.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**Additional Comments:**

**Review Recap**

*Initial Review*    *Follow-up*

(1) Total items tested                      \_\_\_\_\_                      \_\_\_\_\_

(2) Total noncompliance items                      \_\_\_\_\_                      \_\_\_\_\_

**ICMP Compliance Checklist: Section 15, TABLE GAMES EQUIPMENT**  
**For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

**Legend:**

**C** = In Compliance      **N** = Noncompliance      **2C** = In Compliance at Follow-up      **2N** = Noncompliance at Follow-up

Licensee Name	<b>Review Recap</b>		
Prepared By			
Period reviewed (ICO Use Only)		Initial Review	Follow-up
Date & Time Completed	(1) Total items tested		
Date Follow-up Performed	(2) Total noncompliance items		

**DIVISION OF GAMING USE ONLY**

Employee Signature & License #

Casino Manager Signature & License #

**ICMP – 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.

**ICMP – TABLE GAMES EQUIPMENT – A. CARD, TILES AND DICE INVENTORY**

1. 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 to 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. Was the storage area approved by the Division? Are the storage areas dual locked?

C	N	2C	2N
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2. A licensee may use pre-shuffled decks/bricks of cards. The pre-shuffled card manufacturer secures each deck/brick of pre-shuffled cards using seals, tabs, and the number of each person that verified and inspected each deck/brick of pre-shuffled cards. If the process to shuffle, inspect, and package the decks/bricks of re-shuffled cards is automated, there is no need to include the numbers of the persons involved in the verification process.

C	N	2C	2N
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**ICMP Compliance Checklist: Section 15, TABLE GAMES EQUIPMENT**  
**For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

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**2C** = In Compliance at Follow-up

**2N** = Noncompliance at Follow-up

When these cards are brought to the table (monitored under surveillance review), the table games supervisor opens the seal of boxes or decks of cards, removes the cards, and hands the cards to a dealer. The dealer places them into an automated schuffling machine that reshuffles and mixes the cards before dealing commences. The automated shuffler must verify and identify any missing cards. In the event that a card is missing, the licensee will inspect the full deck, replace the missing, and notify the manufacturer of the error using the manufacturers' inventory number as a reference.

3. 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. Does the licensee utilize a pit podium for temporary storage? Are the stored quantities reasonable to accommodate daily operations?

C	N	2C	2N
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4. 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. Is there a card and dice inventory procedure in place? Is the licensee following its procedure? Check the actual inventory against the inventory log.

C	N	2C	2N
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5. 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. Is there a card and dice storage inventory log? Is it properly completed?

C	N	2C	2N
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6. 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. Is there a card and dice pit inventory log? Is it properly completed?

C	N	2C	2N
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7. 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. Is there a card and dice cancellation/destruction log? Is it properly completed?

C	N	2C	2N
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8. 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. Has accounting or the ICO completed the quarterly count? Has accounting or the ICO sent their findings to table

C	N	2C	2N
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**ICMP Compliance Checklist: Section 15, TABLE GAMES EQUIPMENT**  
**For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

**Legend:**

**C** = In Compliance

**N** = Noncompliance

**2C** = In Compliance at Follow-up

**2N** = Noncompliance at Follow-up

games management?

**ICMP – TABLE GAMES EQUIPMENT – B. CARD, TILES, BIG 6 WHEEL, AND DICE INSPECTION AND CONTROL**

1. 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. Inspect the cards and dice to ensure the above requirements have been met. Interview pit supervisors to determine their understanding of the required inspections. Ensure the required tools are maintained in the pit area.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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2. 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 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. Interview pit supervisors to determine their understanding of the procedures. If there are any sealed containers for flawed, damaged or tampered with dice or cards, ensure they include the required information.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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3. 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 use 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. Interview pit staff to determine their understanding of these procedures. Observe tables (live or through surveillance) to determine if the cards and dice are handled in accordance with this procedure.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**INSPECTION AND SECURITY PROCEDURES FOR PAI GOW TILES**

1. 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.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**ICMP Compliance Checklist: Section 15, TABLE GAMES EQUIPMENT**  
**For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

**Legend:**

**C** = In Compliance

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**2C** = In Compliance at Follow-up

**2N** = Noncompliance at Follow-up

2. 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 contiuity 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.

C	N	2C	2N
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- 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.

3. 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 titles 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 activitiy at the Pai Gow Tiles table.

C	N	2C	2N
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4. 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 reponsibility 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 is use.

C	N	2C	2N
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**INSPECTION AND SECURITY PROCEDURES FOR BIG 6 WHEEL**

1. 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	N	2C	2N
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**ICMP – TABLE GAMES EQUIPMENT – C. CARD, TILES, AND DICE CANCELLATION/DESTRUCTION**

1. 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. Has the licensee's method of destruction been approved by the Division? Does it conform to the requirements?

C	N	2C	2N
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2. 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.

C	N	2C	2N
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**ICMP Compliance Checklist: Section 15, TABLE GAMES EQUIPMENT**  
**For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

**Legend:**

**C** = In Compliance

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**2N** = Noncompliance at Follow-up

Licensees have the option to destroy cancelled dice. Interview the pit supervisor to determine their knowledge regarding this requirement.

3. 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.

C	N	2C	2N
---	---	----	----

**ICMP – TABLE GAMES EQUIPMENT – D. MARKING UP ROULETTE CHIP VALUES; CHIP INVENTORY**

1. Licensees must have a procedure in place to adequately identify the worth of non-value chips being used in roulette. Ensure this procedure exists and is up-to-date. I
2. Licensee must possess at least six unique colored sets of non-value chips for each roulette table offered for play. Verify the licensee has enough sets of non-value chips for each roulette table.
3. 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.

C	N	2C	2N
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C	N	2C	2N
---	---	----	----

C	N	2C	2N
---	---	----	----

Ensure these procedures are in place, up-to-date, and are being followed.

4. 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. Ensure these requirements are being followed by the licensee.

C	N	2C	2N
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**ICMP – TABLE GAMES EQUIPMENT – E. INSPECTION AND SECURITY PROCEDURES FOR ROULETTE EQUIPMENT**

1. A gaming manager, pit supervisor or a licensed member of security must perform the inspection and security procedures outlined in CLGR 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

C	N	2C	2N
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**ICMP Compliance Checklist: Section 15, TABLE GAMES EQUIPMENT**  
**For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

**Legend:**

**C** = In Compliance

**N** = Noncompliance

**2C** = In Compliance at Follow-up

**2N** = Noncompliance at Follow-up

necessary. Review via surveillance, the most recent opening of table games and ensure the inspection and security procedures were adequately performed.

2. 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. Ensure the log is maintained in the pit.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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3. All roulette chips, roulette balls, and Pai Gow tiles must be secured when the table is not in use. Ensure the procedure is followed and the roulette chips, roulette balls, and Pai Gow tiles are secured.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**ICMP – TABLE GAMES EQUIPMENT – F. COMMUNICATION EQUIPMENT**

1. 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. Ensure there are no unauthorized applications installed on the mobile ATM device.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**ICMP – TABLE GAMES EQUIPMENT – G. SHUFFLERS**

1. 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.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Surveillance video must be able to view and record all error indicators on all shufflers being used on all table games.

Ensure compliance with these requirements.

**Additional Comments:**

Review Recap		
	<i>Initial Review</i>	<i>Follow-up</i>
(1) Total items tested	_____	_____
(2) Total noncompliance items	_____	_____

**ICMP Compliance Checklist: Section 16, Electronic Promotional Credit Systems (EPCS)  
For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

**Legend:**

**C** = In Compliance

**N** = Noncompliance

**2C** = In Compliance at Follow-up

**2N** = Noncompliance at Follow-up

Licensee Name	<b>Review Recap</b>		
Prepared By			
Period Reviewed (ICO Use Only)		Initial Review	Follow-up
Date & Time Completed	(1) Total items tested		
Date Follow-up Performed	(2) Total noncompliance items		

**DIVISION OF GAMING USE ONLY**

Employee Signature & License #

Casino Manager Signature & License #

**ICMP – ELECTRONIC PROMOTIONAL CREDIT SYSTEMS (EPCS) – A. GENERAL**

1. EPCS require the use of an approved gaming system to affect the electronic transfer of promotional credits directly to or from a slot machine or EBT. Licensees that want to offer EPCS must receive written approval from the Division. Please see the Gaming Systems Testing section in the ICMP for notification and testing requirements. Have the above requirements been followed?

C	N	2C	2N
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2. All slot machines or EBTs enabled with electronic promotional credit functionality must be readily identifiable by patrons. Are all slot machines with EPCS easily identified by patrons?

C	N	2C	2N
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3. Electronic promotional credits transferred to the slot machine or EBT must be recognized as electronic drop (or E-Drop) by the licensee and reported as such on the gaming tax return. Is the electronic drop properly reported on the tax return?

C	N	2C	2N
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**ELECTRONIC PROMOTIONAL CREDITS RESTRICTIONS**

1. In the event that a slot machine can offer both CEP and NCEP credits available for patron play, all NCEP credits must be wagered before any CEP credits may be wagered. CEP credits can be cashed out at any time. Has the EPCS been set up accordingly?

C	N	2C	2N
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2. Credits must download to a slot machine or EBT in increments of at least \$1.00 or the denomination of the game. Has the EPCS been set up accordingly?

C	N	2C	2N
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3. No winning wager from a slot machine or EBT, including a winning wager made with NCEP credits, shall be paid with NCEP credits. Has the EPCS been set up accordingly?

C	N	2C	2N
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4. Licensees must provide notice to the patron of any restrictions specific to NCEP credits. Has the licensee provided notice to all patrons?

C	N	2C	2N
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**ICMP Compliance Checklist: Section 16, Electronic Promotional Credit Systems (EPCS)  
For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

**Legend:**

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**ELECTRONIC PROMOTIONAL CREDIT TRANSFERS**

1. Patrons must access promotional offers at the slot machine or EBT through use of the player's card. The patron must insert his/her player's card, enter his/her PIN into the slot machine or EBT key pad, and select the desired amount to be transferred to the gaming slot machine or EBT credit meter. Does the EPCS allow this functionality?

C	N	2C	2N
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2. The incremental amounts transferred must be at least \$1.00 or the game denomination. Does the EPCS allow this functionality?

C	N	2C	2N
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3. Upon transfer of electronic credits to a slot machine, the slot machine is activated for patron play and functions identically to a slot machine in standard credit play mode. Does the EPCS allow this functionality?

C	N	2C	2N
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**SYSTEM APPLICATION CONTROLS**

1. The licensee must have adequate application controls in place to ensure the accuracy of data input, integrity of system processing, and validity of system output. These controls must include both the operational and accounting/reporting aspects of EPCS and must consider the controls described herein. Only licensed employees are allowed access to the EPCS. Are all employees that access the EPCS licensed? Does the licensee have adequate operational and accounting controls in place? What are those controls? Document a summary of those controls.

C	N	2C	2N
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**WRITTEN PROCEDURES**

1. Written procedures must be in place to ensure EPCS activity is appropriate, and assist in both internal and external (Division of Gaming, local police, etc.) investigations regarding patron disputes. Does the licensee have written procedures to protect the patron's personal information? Review the procedures and ensure the written procedures are adequate.

C	N	2C	2N
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**SETTING-UP PROMOTIONS**

1. All promotions and changes to the parameters of a promotion must be entered into the EPCS by a licensed employee. Ensure the most recent promotion and changes were entered into the system by a licensed employee.

C	N	2C	2N
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**ESTABLISHING A PIN**

1. Only licensed employees are allowed to set up a patron in the patron database used by EPCS. The licensee must require the patron to independently and confidentially create a secure PIN a minimum of two times; the numbers must successfully match each time entered. Licensees must have procedures in place to prevent fraudulent activity in the EPCS. Review who has been entering patrons into the EPCS database and ensure they are licensed. Ensure PIN procedures meet the requirements, and ensure the procedures are

C	N	2C	2N
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effective to prevent fraudulent activity. Does the licensee have procedures in place to ensure fraudulent activity cannot occur? Are reviews of all activity performed? Review an adequate sample of audit trail reports to determine appropriate activity.

**RESETTING AND/OR CHANGING A PIN**

1. A patron's PIN may only be changed when the patron is present at the point of the PIN change, (e.g., if the PIN is changed at the Cage the patron must be present at the Cage at the time of the PIN change). A patron requesting a PIN change must provide official identification verifying his/her identity at the time of the PIN change. Review the procedures for changing a patron's PIN and ensure they are adequate. Ensure patrons are providing identification to verify their identity prior to changing the PIN.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**Additional Comments:**

**Review Recap**

*Initial Review*

*Follow-up*

(1) Total items tested

\_\_\_\_\_

\_\_\_\_\_

(2) Total noncompliance items

\_\_\_\_\_

\_\_\_\_\_

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Licensee Name	<b>Review Recap</b>		
Prepared By			
Period Reviewed (ICO Use Only)		Initial Review	Follow-up
Date & Time Completed	(1) Total items tested		
Date Follow-up Performed	(2) Total noncompliance items		

DIVISION OF GAMING USE ONLY	
Employee Signature & License #	
Casino Manager Signature & License #	

**ICMP – KENO – A. GENERAL**

1. Licensees are responsible for ensuring that keno systems offered at its gaming establishments are approved for use in Colorado and have been completely and successfully tested to comply with the requirements set forth in CLGR 30-2503 and 30-2510. Review the Keno system and ensure it is approved for use in Colorado and that it has been successfully tested and complies with the requirements.
2. A licensee offering the game of keno shall use a keno system approved by the Division. A licensee shall immediately notify the Divisions, of any malfunction of a keno system. Ensure the Division has been notified about any previous malfunctions, and ensure procedures are up to date to ensure the Division will be notified during future occurrences.
3. The licensee may elect to operate a stand-alone keno kiosk. The kiosk must operate within the parameters of Rule 25 and produce all the required reports of live keno. If a stand-alone keno kiosk is in operation at the property, review the kiosk reports and ensure all required reports are being generated.
4. Each licensee shall be required to maintain a record of the winning numbers for each keno game for a period of at least one year. Any keno support documentation that is included with cage documentation will follow the three-year retention requirement. Review keno records and ensure documentation is being preserved as required.
5. For each keno game, adjusted gross proceeds (AGP) equal the total dollar value of tickets written minus the dollar value of total pay outs. Meters may be utilized to support and verify AGP; however, only the actual writes are used in the calculation. Wagered tickets are considered as actual writes on the date of purchase. Any deduction taken for wins occur at the time the winning ticket is redeemed. Review AGP calculations to ensure they are being reported accurately.

C	N	2C	2N
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C	N	2C	2N
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C	N	2C	2N
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C	N	2C	2N
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C	N	2C	2N
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6. Licensees who offer keno must develop system internal controls and include sufficient detail of accounting procedures for keno in the written accounting plan. All licensee's developed internal controls must be reviewed and approved by the Division of Gaming before the casinos use these controls. Verify the following are addressed in the internal controls/written accounting plan and are documented in sufficient detail:

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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- a. Each licensee shall conduct the game of keno in accordance with internal controls for its keno system which shall include:
  - i. Access restrictions; which include access/history documentation (i.e., Access Log and Device History Log) and Key Control.
  - ii. Hardware and software controls; which includes associated equipment (i.e. wireless tablet or other point of sale controls)
  - iii. Override policies and procedures;
  - iv. Keno tickets and payoff information; and
  - v. Backup and recovery procedures. Please refer to ICMP section 6 Backup and Recovery.
- b. Preparing keno drawers and keno runner pouch pays.
- c. Accounting and asset reconciliation over the keno drawers and keno runner pouch pay/bank that include procedures detailing:
  - i. The verification of each keno drawer and keno runner pouch pay/bank by a keno supervisor, main bank cashier, or cage supervisor;
  - ii. Drop, count, and reconciliation of the keno kiosks. Please refer to ICMP section 5 for keno kiosks drop and count procedures;
  - iii. The reconciliation of all accepted wager and payment of winnings tickets;
  - iv. The reconciliation of all keno fills and keno credits' i.e. currency exchanges if any; Fill used to replenish the imprest bank.
  - v. The documenting of any overage or shortage;
  - vi. The reporting of any suspicious winning keno ticket;
  - vii. The forwarding of all reports to accounting on a daily basis.
- d. Inputting patron's keno request into the keno system.
- e. Refunding of any canceled races in a multi-race keno game.
- f. Voiding keno tickets.
- g. Key Controls and Procedures.

**KENO WAGERS**

Placement of Wagers

1. All wagering at the game of keno shall be conducted at an approved keno workstation or in approved areas using a hand-held tablet or portable station connected to the keno system via a secure wi-fi connection. All keno wagering must occur on licensed premises. Ensure all wagering is occurring as required.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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2. All wagers at keno shall be made with currency, coin, gaming chips, coupon, or other Division approved wagering instruments. Each player shall be required to use a keno request in order to place a wager. The only exception is for a quick-pick, a straight or basic keno ticket in which the computer system randomly selects the marked number or numbers (spots) for the patron. Review wagers to ensure they were made in accordance with the requirements.

C	N	2C	2N
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3. A keno ticket may not be voided or changed once the first game wagered on the ticket has been closed and the game draw started. Multi-race keno tickets can be terminated at the discretion of the operator in a quit-race or early out transaction, wherein all remaining games shall be voided and refunded and any wins thus far shall be paid. Review transactions to ensure compliance with this requirement.

C	N	2C	2N
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Placing a Wager with a Keno Runner

1. If communication between the keno runner or keno runner/writer and the system is down, no keno ticket purchases or keno winning ticket payments may occur via a pouch pay. The winning ticket payment must occur through the writer. Ensure transactions are compliant with this requirement.

C	N	2C	2N
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2. If a patron requests to place a keno wager with a keno runner, the keno runner shall:
- Require the patron to complete a two-part keno runner request where required by a keno system or licensee's procedures, and to present currency, coin, gaming chips, slot tokens, or coupons in an amount sufficient to fund the request;
    - A runner may accept payment for a wager in another casino that is contiguous and under common ownership as the casino where the keno ticket is written. However, the keno ticket must be written in the casino where the physical keno game is housed, in the licensed gaming area.
    - A wager is placed where and when the keno ticket is written.
  - Provide the duplicate of the keno runner request to the patron as a receipt for the keno wager, where a keno runner request is required by a keno system or licensee's procedures;
  - If applicable, the wager may be added through a mobile hand-held point of sale keypad or tablet;
  - Take the patron's wager information together with the currency, coin, gaming chips, slot tokens, or coupons to a keno writer at a keno workstation or to a keno booth, satellite keno booth, or keno locker where the keno runner has a keno drawer;
  - Receive the keno ticket or tickets and any change from the keno writer or generate them directly at his or her workstation in a keno booth, satellite keno booth, or keno locker; and
  - Deliver the keno ticket or tickets and any monies due to the patron.

C	N	2C	2N
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No keno supervisor or keno writer shall start a keno game until all keno runners who are

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authorized to accept wagers for that game have recorded the wagers they have accepted. Written procedures must be in place detailing how this will be achieved.

Review keno transactions and ensure compliance with these requirements.

Redeeming a Winning Ticket with a Keno Runner

1. If a patron requests to redeem a winning keno ticket with a keno runner, a keno runner shall:
  - a. Accept the ticket from the patron; provided, however, a keno runner who generates and redeems keno tickets at a keno workstation, utilizes a winning keno ticket report to verify the winning ticket and has sufficient funds in his or her pouch to redeem the ticket, may accept the ticket in exchange for the winning payout;
  - b. Take the winning ticket to a keno writer for processing. If the keno runner has paid the patron directly from his or her pouch the keno writer shall transact with the runner to collect or pay any monies transaction. If a keno runner also functions as a writer, the runner's own writer bank funds the runner pouch;
  - c. Unless the keno runner has paid the patron directly from his or her pouch, obtain the proceeds of the ticket or the change due from the keno writer or the keno runner's drawer; and
  - d. Deliver the proceeds or the change due to the patron.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Review keno redemption transactions to ensure they are compliant with these procedures.

Payment of Winning Wagers

1. Except as otherwise provided for pay outs which exceed \$500.00 but less than \$1,500, after the 20 numbers have been selected by the draw device and are finalized in the keno system, a player may take a winning keno ticket to a keno workstation for redemption or give the winning ticket to a keno runner who shall redeem the ticket on behalf of the patron. All winning wagers shall be paid in accordance with the information recorded in the keno system and on the computer-generated keno ticket. The winning ticket must be presented to the keno writer or runner and exchanged for the winning amount of cash or purchase of another ticket.
2. Winning wagers with a payout equal to or greater than \$1,500 (reduced by the wager) but less than \$5,000 shall be authorized by a keno supervisor or a supervisor thereof. Winning wagers with a payout of \$5,000 or more shall be authorized by the Gaming Manager to whom the keno supervisor reports to or a supervisor thereof. The keno manager or appropriate personnel shall sign the back of the winning keno ticket as evidence of such authorization. Also, an IRS W-2G Statement of Gambling Winnings must be completed in accordance with IRS regulations. Refer to IRS W-2G requirements for proper completion of

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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this form. Licensees must verify whether the taxable keno winner is listed in the GPI registry. Please refer to ICMP Section 1 General, for GPI Procedures.

Review winning wagers with payouts greater than \$1,500 (reduced by the wager) but less than \$5,000 and ensure compliance with these requirements.

3. The barcode of the winning keno ticket or QR code which is not accepted or read by the keno writer station point of sale terminal or wireless mobile point of sale device, shall require that the ticket serial number be manually input by the keno writer or keno runner/writer in accordance with the licensee's internal control procedures.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Review the internal control procedures and ensure they are up to date, address minimum requirements and are being followed. Review transactions to ensure compliance.

4. If the keno system is not operational, in accordance with the licensee's internal control procedures, a winning keno ticket:

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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- a. For \$10.00 or less may be manually paid by a keno writer or keno runner/writer;
- b. For more than \$10.00 but less than or equal to \$1,000, may be manually paid by the keno writer or keno runner/writer with authorization from the keno supervisor or a supervisor thereof; and
- c. For over \$1,000, may not be paid until the keno ticket can be verified by the keno computer system.

Review past transactions to ensure they are compliant with the requirements if the keno system was not operational at the time.

**Keno Ticket**

1. The keno ticket shall contain, at a minimum, the following:
  - a. The date and time of issuance;
  - b. The keno workstation number where the ticket was issued;
  - c. The numbers selected by the patron listed in a clearly identifiable manner; the designation of groups using symbols or alpha characters;
  - d. The number of games to be played;
  - e. The first and last game number;
  - f. The conditioning;
  - g. The rate of each wager or way;
  - h. The number of ways played for each spot group;
  - i. The total price of the keno ticket;
  - j. The identification number or number of the keno writer;

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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- k. A conspicuous notice that the keno ticket shall expire no less than 120 days from the final race completion date, after which the obligation of the licensee to pay the patron will expire; and
- l. The name of the casino issuing the ticket.

Review a sample of keno tickets to ensure they contain the above-mentioned minimum information.

2. If a licensee offers multi-race keno tickets, a patron will complete one keno request for all of the games wagered by the patron. The licensee will pay all winning games once all games are completed, unless any of the games are canceled. If any of the games are canceled, the licensee may permit the refund of all canceled games found on a multi-race keno ticket, as long as the keno system can generate adequate documentation for the refund.

C	N	2C	2N
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If multi-race keno is offered for play, review transactions to ensure compliance with this requirement.

**ICMP – KENO – B. KENO WORKSTATION DRAWERS**

1. A keno imprest bank is a bank that contains a pre-determined and constant dollar amount of currency and coin. At any point in time, the total of the contents in the imprest bank must equal the pre-determined dollar amount. Overages and shortages must be documented on an overage/shortage slip. Request an impromptu audit of an imprest bank in use to ensure it balances to the pre-determined, constant value. Review documentation for overages and shortages and ensure the variances are either resolved or immaterial.

C	N	2C	2N
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2. Keno workstation drawers must be an imprest bank that are part of the cage accountability. These banks must be reflected on the Cash Inventory Sheet under miscellaneous banks and independently inventoried twice each shift (open & close) by two cashiers or one cashier and the gaming manager during the gaming day.

C	N	2C	2N
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Imprest banks maintained in the cashier cage must be inventoried prior to the imprest bank being used. An imprest bank which is not operational for that gaming day must be independently inventoried at least once during the gaming day. If an overage or shortage is noted, an investigation is conducted into the discrepancy. The results of the investigation must be documented.

C	N	2C	2N
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Ensure the drawers are accounted for appropriately and that inventory is performed in accordance with the requirements.

3. Keys to the keno drawers shall be maintained and controlled in compliance with ICMP Section 10, Key Control. Each keno drawer key shall be signed in and out in accordance with

C	N	2C	2N
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Section 10. Review key control for the keno drawers and ensure compliance for proper key control.

4. No licensee shall cause or permit currency, coin, or gaming chips to be added or removed from the keno imprest bank or pouch pay bank during the gaming day except:

C	N	2C	2N
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- In exchange for a keno ticket purchased by a patron;
- To make change for a patron buying a keno ticket;
- In receipt of a coupon from a patron in exchange for currency, coin, or a keno ticket;
- To pay a winning keno ticket;
- To refund a voided keno ticket; or
- In conformity with keno fill and keno credit CURRENCY EXCHANGE procedures.

Ensure the keno imprest bank or pouch pay bank is being used only for authorized transactions.

**POUCH PAYS**

Pouch Pay/Bank Check-Out Procedures – From the Cashier Cage to Keno Runner/Writer

1. Pouch pay banks (funds) must be an imprest bank that are a part of the cashier cage accountability and must be documented on the Daily Cash Summary. Pouch pay banks are maintained in the cashier cage or in an alternate locked and secured area (pouch cabinet) under surveillance coverage.

C	N	2C	2N
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Ensure banks are maintained according to the requirements.

2. When the keno runner or keno runner/writer checks out their imprest bank/pouch from the cashier cage, ensure the following procedures are performed:

C	N	2C	2N
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- Imprest banks/pouches may be prepared before check out as long as the imprest amount is reflected on the Daily Cash Summary. The cashier preparing or disbursing the bank to the keno runner performs an inventory of the bank and completes and Imprest Bank Inventory form. The cashier completes a Miscellaneous Disbursement form to support that the funds are leaving the cage. The inventory form is attached to the Miscellaneous Disbursement form.
- The cashier gives the keno runner or keno runner/writer an imprest pouch bank and completes the paid-out portion of the Miscellaneous Disbursement form by documenting the date, shift, and dollar amount of the bank.
- The keno runner or keno runner/writer recounts the imprest pouch bank. If there are no discrepancies, both the cashier and the keno runner or keno runner/writer sign the Imprest Bank Inventory form and Miscellaneous Disbursement form. The cashier maintains both forms.

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Pouch Pay/Bank Check in Procedures – From the Keno Runner or Runner/Writer to the Cashier Cage

1. When the keno writer/runner checks in their bank/pouch to the cashier cage, ensure the following procedures are performed:
  - a. The keno runner or keno runner/writer prints or requests a report that details the keno activity by that keno runner during their shift or session. The keno writer/runner reconciles their keno activity to this report. If an even money exchange was performed during the shift and any writes, or payouts were exchanged with the cashier or keno main bank this report may list all writes, or payouts that were redeemed by the keno runner during their shift. If this is the case, a reconciliation of writes, or payouts already exchanged with the cage or keno main bank must be performed to ensure that all writes, or payouts redeemed are accounted for. The report printed at the time of even money exchanges must be used to assist in the reconciliation. The licensee must ensure a procedure is in place in order for the keno runner/writer to perform an adequate reconciliation when writes, or payouts have been previously exchanged with the cage or keno main bank during the shift.
  - b. The keno runner or keno runner/writer turns in their cash and copy of the writes, any payouts and report to the cashier or keno main bank. The cashier or keno main banker counts the cash, verifies the writes and payouts slips. A new Imprest Bank Inventory form is completed and the dollar amount of the inventory must tie to the original imprest bank/pouch inventory amount. Both the cashier or keno main banker and the keno runner or keno writer sign the inventory form and the cashier or keno main banker retains the form.
  - c. The cashier completes the paid in portion of the Miscellaneous Receipt form documenting the date, shift, and amount of the bank. The cashier and the keno runner sign the Miscellaneous Receipt form.
  - d. The Imprest Bank Inventory form, the Miscellaneous Receipt form, the writes, payouts and reports are maintained by the cashier, the amounts recorded on the Daily Cash Summary and forwarded to accounting with the cage paperwork for that shift.
  - e. The imprest bank can be re-imprest prior to checking the bank into the cage.
  - f. If an overage or shortage occurs, the keno writer/runner completes an overage or shortage slip, and the supervisor shall investigate any overages/shortages.
  - g. If an overage occurs, the excess amount from the keno runner's bank is given to the cage cashier who records the overage as a separate line item on the Daily Cash Summary.
  - h. If a shortage occurs, a shortage slip is prepared and given to the cage cashier. The cage cashier records the shortage as a separate line item on the Daily Cash Summary.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**ICMP – KENO – C. KENO CURRENCY EXCHANGES**

1. Even exchanges of chips, tokens, coupon, tickets and/or coins may be made at the cage or the imprest keno main bank. If a keno writer, keno runner or keno runner/writer needs additional currency or coin, the keno writer or keno runner shall prepare a keno bank exchange form in accordance with the Division's Internal Control Minimum Procedures. Review currency exchange transactions and ensure they are compliant with the requirements.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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2. Even money exchanges between the keno banks and the cashier cage must be monitored by surveillance. The monitoring must be of such quality that the transaction cameras are able to differentiate between bill denominations, and between chip, token, and coin denominations. The amount of chips must be identifiable by the color and/or design of the chips. Ensure the exchanges are compliant the requirements.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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**ICMP – KENO – D. KENO CREDITS**

1. A keno writer or keno runner may transfer currency, coin, gaming chips, slot tokens, and coupons to the cashier's cage by preparing a keno credit form in accordance with the Division's Internal Control Minimum Procedures.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

Perform a review of these transactions and ensure they comply with the requirements.

**ICMP – KENO – E. KENO KIOSK**

1. The licensee may elect to operate a stand-alone keno kiosk which will be required to produce all the required reports of live keno. Additionally, the keno kiosk may accept input from the patron of any casino player reward accounts and the keno system may permit acceptance or granting of points for electronic keno game purchases.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

If a stand-alone keno kiosk is utilized, ensure it meets the requirements.

2. The licensee, at its discretion, shall determine the number of keno games to be conducted during the gaming day. A licensee may conduct keno games at different intervals at separate locations within the licensed premises. Each keno game conducted during the gaming day shall be assigned a unique sequential game number and time stamp by the keno computer system. A casino that uses a keno kiosk may independently determine the limit or time between electronic keno games.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

Ensure that each keno game has been assigned a unique game number, that the game numbers are sequential, and that they also have a time stamp.

**ICMP Compliance Checklist: Section 17, Keno**  
**For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

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Access to Keno Kiosk

- Each licensee shall conduct the game of keno in accordance with internal controls for its keno system which shall include:

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Access restrictions; which include access/history documentation (i.e., Access Log and Device History Log).

A kiosk access log must be maintained inside each kiosk. The handwriting must be legible and discernable to a person reviewing the log. Each person who accesses a slot machine or kiosk for any defined event shall make an entry on the log. A defined event includes, but is not limited to, the following:

- Service and repairs,
- Clearing bill/ticket validator jams,
- Tilt resets,
- Cassette fills,
- Troubleshooting error conditions,
- Coin test activity

All logs must reflect the title of the form, licensee name, and device number. Minimum required information for each entry is date, time, employee initials and license number of the individual accessing the machine, and the reason for access. Entries are to be complete, accurate, and legible. If a door is opened twice by the same individual during a fill, the log may be signed once with an entry of "fill x 2." If two individuals opened the door during a fill, the log must be completed by each individual upon their respective access.

Ensure the access to the kiosk is restricted to authorized personnel and the aforementioned requirements are being met.

- Licensees must have procedures in place which allows for the electronic version of the device history logs to be maintained and secured on a portable device by the licensee. The procedures must also allow for the electronic files to be accessible to licensees, which can be viewed at each individual gaming device or kiosk immediately upon request by the Division.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

Ensure proper procedures are in place and that the files can be recalled immediately.

Wagers Placed at a Keno Kiosk

- If a licensee's keno kiosk permits multi-race keno tickets, a multi-game ticket shall be used for all of the games to be wagered by the player and the multi-games tickets shall be inserted into the kiosk. The player shall be required to pay for the wager prior to the start

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Revised August 2022

Effective November 2022

**ICMP Compliance Checklist: Section 17, Keno**  
**For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

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of the first game. Ensure wagers made at kiosks are compliant with this requirement.

Voided or Refunded Keno Kiosk Tickets

1. A keno kiosk ticket may be voided prior to the start of the game for which the keno ticket was issued. A multi-race keno ticket may only be voided, in its entirety, prior to the start of the first game for which the keno ticket was generated. The method for voiding keno kiosk tickets shall be in accordance with the licensee's internal control procedures. Each keno computer system shall be capable of maintaining, on a daily basis, a listing of voided keno tickets for each keno workstation.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

Review the keno system for a listing of voided keno tickets; ensure voids are being processed in compliance with the requirements.

2. A licensee may permit a player to receive a refund on a multi-race keno ticket for those games not drawn; provided, however, that the keno computer system is capable of generating adequate documentation for the refund and the procedures governing the refund transaction are in accordance with the licensee's internal control procedures.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

Review the keno system for refunded keno tickets; ensure refunds are being processed in compliance with the licensee's internal control procedures.

Keno Kiosk Ticket Redemption

1. A player may take a winning keno ticket to a kiosk where a printed TITO ticket as a receipt for a winning keno ticket is issued, which contains, at a minimum the serial number of the keno ticket. A player then takes the keno ticket receipt to a keno workstation or cashier to cash out.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

Ensure the keno ticket receipt lists the serial number of the keno ticket and is redeemed in accordance with the requirements.

2. Winning wagers with a payout of \$1,499 or less will be paid through the keno workstation or cashier. Winning wagers with a payout equal to or greater than \$1,500 (less the wager) but less than \$5,000 shall be authorized by a keno supervisor or a supervisor. Winning wagers with a payout of \$5,000 or more shall be authorized by the gaming manager to whom the keno supervisor reports or a supervisor thereof. The keno supervisor or gaming manager thereof shall sign the back of the winning keno ticket as evidence of such authorization.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

Review winning wagers and ensure payouts greater than \$5,000 contain the signature of the keno supervisor or gaming manager on the back of the winning keno ticket.

**ICMP Compliance Checklist: Section 17, Keno**  
**For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

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3. Patrons with multi-game tickets shall not be paid for any winning games until the completion of the last game for which the multi-race keno ticket was issued unless the remaining races on the multi-race keno ticket are cancelled.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

Review multi-race keno tickets and ensure no payouts occurred until the completion of the final race unless the remaining races were cancelled.

4. All winning keno tickets shall expire no less than 120 days from the final race completion date.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Review winning keno tickets and ensure they are valid for at least 120 days from the final race completion date.

**ICMP – KENO – F. KENO GAMBLING PAYMENT INTERCEPT**

1. Report gambling winnings on Form W-2G if the winnings are \$1,500 (reduced by wager) or more from a keno game.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

The licensee shall follow the current IRS standards for keno jackpot awards and perform a gaming intercept as required for all jackpot pay outs as outlined in the Internal Control Minimum Procedures Section 1 H. Please refer to ICMP Section 1 General, H for GPI procedures.

Ensure gambling winnings from keno games are meeting the requirements for GPI.

**ICMP – KENO – G. UNCLAIMED KENO WINNING PAYOUTS**

1. Revenue audit or accounting must generate daily reports on a weekly basis to verify if an unclaimed taxable keno jackpot hit. When one is found, surveillance must pull a picture of the patron. An attempt to identify the patron through a player's card or cage transaction. The patron has no less than 120 days from the date of final race completion to claim the winning ticket otherwise the ticket expires. All paperwork must be kept together until either the winning ticket is claimed or the ticket expires.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

Review documentation to ensure daily reports are being generated on a weekly basis and ensure if an unclaimed taxable keno jackpot hit, that surveillance pulled a picture of the patron. Also ensure an attempt to identify the patron has been made and that paperwork is kept together until the winning ticket was either claimed or the ticket expired.

**ICMP Compliance Checklist: Section 17, Keno**  
**For Use by Division of Gaming and Independent Compliance Officers (ICOs)**

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**ICMP – KENO – H. PROGRESSIVE KENO GAMES**

1. A progressive keno game is a game with an award that increases based on the placement or result of a wager. A progressive keno game can be:
  - a. A single keno game; or
  - b. Linked with two or more Colorado licensed retail establishments (Multi-link system, also known as Wide Area Progressive (WAP)).

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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A progressive jackpot meter must be shown for any keno progressive offered. Ensure the progressive meter is shown for any keno progressives offered.

2. Pursuant to CLGR 30-2504(2), Records must be maintained that support the current amount shown on a progressive jackpot meter. The Licensee must establish control procedures which provide supporting documents to explain and/or reconcile any increase, reduction, or discontinuance of a progressive jackpot amount offered for patron play at a licensed retail establishment. The records and documents must be retained in accordance to the records retention requirements set forth in Regulation 30-1607.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

Review progressive records and control procedures to ensure the supporting documents explain changes to the progressive jackpot amounts offered for patron play.

3. Normal mode of progressive keno games.
  - a. During the normal mode of progressive games, the keno system, if it serves as a progressive controller for “local” casino operated progressives, must increment the progressive amount at the time of each game draw calculation and apply any progressive contributions calculated to the progressive jackpot. The progressive jackpot must account for, and reflect, the total contribution of all qualifying wagers placed.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

The licensee offering the progressive must establish key control procedures to prevent unauthorized access to the progressive controller hardware or system. Review key control procedures and ensure they are sufficient to prevent unauthorized access to the progressive controller hardware or system.

4. If more than one progressive keno game is configured in the keno system, the progressive meter must automatically display the reset amount after an award. If a hidden amount is configured, the progressive meter will reset to the hidden meter amount configured after a progressive win. The progressive jackpot meter must display the following information:
  - a. The winning progressive jackpot amount; and
  - b. The new reset amount that is displayed

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Review progressive meter information and ensure the meter displays the required information.

- No licensee may discontinue a progressive keno game until all of the advertised progressive amounts or prizes or both have been awarded, or the advertised progressive amount, minus the normal non-progressive award for the combination that would have awarded the progressive amount, is moved to another progressive link within the licensed establishment or this amount is disbursed in another method approved by the Division, such as an additional pay out.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

Review progressive keno award and ensure they were not discontinued until the advertised win has been awarded and/or verify the progressive offering was moved to another progressive link or disbursed in accordance with the Division approved method.

**Keno Games – Multi-Link Systems/Wide Area Progressive (WAP) Systems and Deductions on Tax Returns**

- Please refer to CLGR 30-2504.01 for submission and approval requirements. The approval requirements would include reviewing and approving internal controls, reporting, and cash requirements found in CLGR 30-2504 (3) – (6).

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Multi-link systems are the collection of hardware, software, and associated equipment used to link keno hose systems with satellite keno systems and can include progressive keno systems that offer keno games and/or progressive keno game across telecommunication lines between two or more Colorado licensed retail establishments. Multi-state systems are the collection of hardware, software, and associated equipment used to link and monitor progressive keno across telecommunication lines in at least one Colorado licensed retail establishment and in one or more lawfully operated casino(s) in other jurisdictions that participate in the same multi-state wide-area progressive keno system. Persons authorized to control or operate a multi-link or multi-state keno system, must hold a valid operator or manufacturer distributor (or Associated Equipment Supplier) license issued by the Commission.

Ensure persons authorized to control or operate the multi-link or multi-state keno system hold a valid manufacturer (or Associated Equipment Supplier) license in the State of Colorado.

- All primary jackpots won by patrons will be paid directly by the statewide and multi-state multi-link vendor. Each licensee will receive a report detailing its pro-rated portion of the keno award that is allowable as a deduction on the tax return to arrive at taxable AGP. The licensee's pro-rated portion of statewide primary jackpots paid during the month is reported in the "Statewide Contributions" box for the multi-denomination slot denomination on the

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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monthly gaming tax return.

Review documentation and determine if any primary multi-state or multi-link jackpots were won; verify the correct deduction was taken to the tax return and proper taxes remitted.

**ICMP – KENO – I. KENO TOURNAMENT PROCEDURES**

1. Refer to CLGR Rule 30-2512 for guidelines on keno tournaments. All keno tournament rules must be submitted and approved by the Division five days before the tournament's scheduled start. The conditions for all contests and tournaments are prominently displayed or available for patron review in the keno area and/or player's club.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

If a keno tournament has been offered for patron play, ensure the rules were submitted timely and approved by the Division prior to being offered for play. Also ensure the contest/tournament conditions are prominently displayed and available for patron review.

2. All contest/tournament entry fees and prize pay outs (including mail transactions) are summarized daily on a document which includes:
  - a. Patron's name;
  - b. Date of entry/pay out;
  - c. Dollar amount of entry fee/pay out (both alpha and numeric) or nature and dollar value if a non-cash prize;
  - d. Signature of the individual completing the transaction attesting to the receipt or disbursement; and
  - e. Name of the contest/tournament.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

Contest/tournament entry fees and payouts are summarized and posted to the accounting records on at least a monthly basis. If contests or tournaments were offered for patron play, ensure the daily summarization contains the aforementioned required information.

3. Contest/tournament rules are included on all entry forms/brochures and are prominently displayed or available for patron review in the keno area and/or player's club. The rules indicate at a minimum:
  - a. All conditions the patron must meet to qualify for entry into, and advancement through the contest/tournament;
  - b. Specific information pertaining to any single contest/tournament, including dollar amount of money placed in the prize pool; and
  - c. The distribution of funds based on specific outcomes.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

Verify rules are included on entry forms and brochures and prominently displayed for patron review.

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4. Results of each contest/tournament are recorded and available for participants to review. The recording includes the name of the event, dates of the event, total number of entries, dollar amount of entry fees, total prize pool, and dollar amount paid for each winning category. The name of each winner is recorded and maintained but not made available to the participants unless authorized by management personnel. This also applies to free tournaments (i.e.; the patron does not pay an entry fee) except the total number of entries, dollar amount of entry fees, and total prize pool are not required for free tournaments.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
----------	----------	-----------	-----------

All contest/tournament records are maintained for each event in accounting. Review the documentation to ensure it meets the requirements.

**ICMP – KENO – J. TIPS**

1. Casino must have procedures in place for accepting and processing tips received by the keno writer and keno runner. Tips received by a keno writer or keno runner are deposited into a container clearly marked “tips” or distinguishable as a depository for tips. Tips received by a keno writer or a keno runner cannot be combined with the casino’s monies. Tips receipted into the cage may impact cage accountability depending upon how they are distributed, and therefore must be reflected accordingly on the Daily Cash Summary.

<b>C</b>	<b>N</b>	<b>2C</b>	<b>2N</b>
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Review the process for handling tips and ensure it is compliant with the requirements.

**Additional Comments:**

Revised August 2022  
 Effective November 2022

Review Recap		
	<i>Initial Review</i>	<i>Follow-up</i>
(1) Total items tested	_____	_____
(2) Total noncompliance items	_____	_____



# Internal Compliance Officer (ICO)

## SAMPLE SELECTION DOCUMENTATION

### Updated December 2020

This page documents the samples dates selected for observations of slot, kiosk and table drop and count procedures, and the sample dates and number of forms selected for testing compliance with the ICMP. This form must be completed in its entirety. If an area is not applicable, mark N/A.

Licensee Name	
Prepared By	
Job Title	
Period Covered	
Date Completed	
General Manager	

#### **OBSERVATIONS PERFORMED:**

Coin Drop Date: \_\_\_\_\_  
 BV/Ticket Drop Date: \_\_\_\_\_  
 Table Drop Date: \_\_\_\_\_  
 Kiosk Drop Date: \_\_\_\_\_

Coin Count Date: \_\_\_\_\_  
 BV/Ticket Count Date: \_\_\_\_\_  
 Table Count Date: \_\_\_\_\_  
 Kiosk Count Date: \_\_\_\_\_

**Note:** The “date” is the gaming date the drop, count took place. Beside the date for each observation indicate if the observation was conducted live during the process (physical) or through viewing surveillance tapes (surveillance).

If the drop and/or count observation(s) was completed by viewing surveillance tapes, list the date(s) you reviewed the surveillance tapes.

Surveillance tape reviewed on \_\_\_\_\_

#### **DOCUMENTATION TESTED:**

In the following table list each gaming form tested (includes documents and reports). For each form tested list the gaming date of the form and the number of documents tested. See ICO Instructions regarding sample size and sample selection. Highlighted areas indicate that testing is not applicable for that period. Letters in parenthesis following the NAME OF DOCUMENT correspond to the attribute worksheet used for testing. For example: **Fill/Credit Slip (K)** – “Fill/Credit Slip” is the name of the document and “(K)” is the attribute worksheet you would use for testing.

	Attribute Sheet						ICO Checklist Reviews			
1 <sup>st</sup> Review Period	1 <sup>st</sup> Sample Jan & Feb		2 <sup>nd</sup> Sample March & April		3 <sup>rd</sup> Sample May & June		Sample for Jan - June			
2 <sup>nd</sup> Review Period	1 <sup>st</sup> Sample July & August		2 <sup>nd</sup> Sample Sept & October		3 <sup>rd</sup> Sample Nov & Dec				Sample for July - December	
NAME OF DOCUMENT	Date(s) of Doc	# of Docs tested	Date(s) of Doc	# of Docs tested	Date(s) of Doc	# of Docs tested	Date(s) of Doc	# of Docs tested	Date(s) of Doc	# of Docs tested

TABLE GAMES										
TG Additional Payout Request										
Fill/Credit Slip (K)										
Opener/Closer Table Inv. (L)										
Request For Fill/Credit Slip (J)										
Request for Table Games Jackpot Payout Slip (M)										
Table Games Activity Log (e)										
Table Games Jackpot Payout Slip (N)										
Table Games Payout Form (X)										
Table Games Tournament Entry Fee & Buy-In Log (Z)										
Table Games Tournament Entry Fee & Buy-In Log (Multi-Licensee) (Y)										
Table Games Progressive Jackpot Log										
Poker Bank Exchange Form (a)										
Poker Jackpot Award Drop Log										
Poker Jackpot Log										
SLOT MACHINES										
Slot Additional Payout Request										
Device History Log										
Jackpot Payout/Fill Slip (C)										
Progressive Bank Modify/Transfer										
Progressive Jackpot Log										
Progressive Tracking Log										
Slot Machine   EBT Access Log										
Slot Tournament Entry Fee Log										
Slot Tournament Prize Form										
Unclaimed Jackpot Receipt										
DROP & COUNT										
Early Table Drop Log										
Master Games Sheet (V)										
Poker Jackpot Count Card (O)										
Soft Count Card (I)										
Bill Validator Summary (E)										
Count (Weigh)/Wrap Variance Report (F)										
Hopper Summary Report										
Meter Reading Summary/Bill										
Meter Read. Sum. - Soft (G)										
Slot Summary Report (D)										
Kiosk Count Summary (W)										
CAGE										
Cash Inventory (A)										
Change Bank Exchange Form										
Daily Cash Summary (B)										

Revised December 2020  
Effective November 2022

	Attribute Sheet						ICO Checklist Reviews			
1 <sup>st</sup> Review Period	1 <sup>st</sup> Sample Jan & Feb		2 <sup>nd</sup> Sample March & April		3 <sup>rd</sup> Sample May & June		Sample for Jan - June			
2 <sup>nd</sup> Review Period	1 <sup>st</sup> Sample July & August		2 <sup>nd</sup> Sample Sept & October		3 <sup>rd</sup> Sample Nov & Dec				Sample for July - December	
NAME OF DOCUMENT	Date(s) of Doc	# of Docs tested	Date(s) of Doc	# of Docs tested	Date(s) of Doc	# of Docs tested	Date(s) of Doc	# of Docs tested	Date(s) of Doc	# of Docs tested

Imprest Bank Inventory										
Signature Cards or Authorization Logs										
Vault Inventory Form										
Daily Vault Summary										
Vault Transfer Slip										
<b>KEY CONTROL</b>										
Bill Validator Release Access Key Log/System generated report										
Drop Locked Box Access Key Log										
Duplicate Key Control Log For Restricted Keys										
Security Locked Box Access Key Log (Locked Box #1)/ System generated access report										
Gaming Manager Locked Box Access Key Log (Locked Box #2)/System generated access report										
AKTS: System Access – Terms and Transfers										
AKTS: System Administrator Access review.										
AKTS Maintenance Log										
<b>ACCOUNTING</b>										
Bagged Coin/Token Verification Form										
Forms Control Log										
Meter Reset Form										
Slot Tournament Summary Form										
Table Games Tournament Summary Form										
Table Games Tournament Summary Form (Multi – Licensee)										
<b>Statistical &amp; Supporting Reports</b>										
Table Games Master Games Summary Report (c)										
Table Games Statistical Rpt (d)										
Bill Drop Rpt by Denom.										
Drop Comparison Report (P)										
Jackpot Comparison Rpt (R)										
Monthly Slot Revenue Summary (b)										
Theoretical Hold Report (U)										
Ticket In Comparison Rpt (T)										
Ticket Out Comparison Rpt (S)										
Tickets from Kiosk Counted by the Count Team										

	Attribute Sheet						ICO Checklist Reviews			
1 <sup>st</sup> Review Period	1 <sup>st</sup> Sample Jan & Feb		2 <sup>nd</sup> Sample March & April		3 <sup>rd</sup> Sample May & June		Sample for Jan - June			
2 <sup>nd</sup> Review Period	1 <sup>st</sup> Sample July & August		2 <sup>nd</sup> Sample Sept & October		3 <sup>rd</sup> Sample Nov & Dec				Sample for July - December	
NAME OF DOCUMENT	Date(s) of Doc	# of Docs tested	Date(s) of Doc	# of Docs tested	Date(s) of Doc	# of Docs tested	Date(s) of Doc	# of Docs tested	Date(s) of Doc	# of Docs tested

Ticket from Slot Device Counted by Count Team										
Tickets Issued Report										
Tickets Redeemed by Cashier Rpt. Produced by Cashier										
Tickets Redeemed by Device Report										
Tickets Redeemed by Issuing Machine Report										
Tickets Redeemed by Kiosk Report										
Tickets Unredeemed Report										
Detail Report										
EPCS Credits Issued and Expired Report										
EPCS Detail Report										
EPCS Machine Activity Report										
EPCS Player Activity Report										
CEP-In Stat Rpt (f)										
NCEP-In Stat Rpt (g)										
NCEP-Out Stat Rpt (h)										
<b>TIPS</b>										
Tip Count/Summary Sheet										
Tip Distribution Sheet										
<b>TABLE GAMES EQUIP'T</b>										
Card & Dice Storage Inventory Log										
Card & Dice Pit Inventory Log										
Card & Dice Cancellation/Destruction Log										

Use the Attribute Worksheets to complete the first six columns of this document and use the ICO Checklists to complete the final four columns, documenting the sample dates used for testing gaming forms and reports.

See ICO Instructions on how to submit this document to the Division.



## Internal Compliance Officer (ICO) STATEMENT OF COMPLIANCE

Licensee Name	
Prepared By	
Job Title	
Period Covered	
Date Completed	
General Manager	

I have completed an examination of the administrative and accounting controls relative to **[Casino Name]** during **[MMM-DD-YYYY] – [MMM-DD-YYYY]**. The objectives of my examination are to evaluate the adequacy and effectiveness of the system of internal controls for gaming areas, to determine the degree of compliance with those controls, and to determine the degree of compliance with the Colorado Division of Gaming's Internal Control Minimum Procedures (ICMP) and Colorado Limited Gaming Regulations (CLGR).

The examination procedures included a review of the existing system of internal controls, tests of compliance with those controls, observations of operations, detailed tests of transactions and records and interviews with key operational and accounting personnel. These examination procedures were performed during **[MMM-DD-YYYY] – [MMM-DD-YYYY]**.

Based on the testing performed, an adequate system of internal controls exists for **[Casino Name]** and generally compliance with the ICMP existed during **[MMM-DD-YYYY] – [MMM-DD-YYYY]**, with the exceptions noted in the ICO Report.

\_\_\_\_\_  
ICO Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
General Manager's Signature

\_\_\_\_\_  
Date

See ICO Instructions on how to submit this document to the Division.



## Internal Compliance Officer (ICO) SUMMARY OF TEST RESULTS

This page is a summary of the testing completed using the ICO Checklists and Attribute Worksheets.  
This summary reflects the number of items tested and the number of items found out of compliance.

Licensee Name	
Prepared By	
Job Title	
Period Covered	
Date Completed	
General Manager	

### SUMMARY

SECTION (Corresponds to the ICO Checklists and ICMP sections)	Total Number of Items Inspected	Number of Noncompliance Items
General		
Table Games		
Poker		
Slot Machines		
Slots, Kiosk, Table Games Drop & Count		
Ticket In/Ticket Out, Purchase Tickets & Slot Coupons		
Cashier		
Key Control		
Accounting		
Non-compliance issues found in accounting from other departments *		
Surveillance		
Dealer Tips		
Table Games Equipment		
Electronic Promotional Credit Systems		
Keno		
<b>TOTAL ALL SECTIONS</b>		

\* These are noncompliance items found while completing the Accounting ICO checklists and attribute worksheets that accounting staff identified as being noncompliant but were the responsibility of another section, i.e. missing signatures on jackpot slips. If accounting staff did not identify the noncompliance the issue is noted under Accounting.

See ICO Instructions on how to submit this document to the Division.