

Nottawaseppi Huron Band of the Potawatomi Gaming Commission Sports Betting Regulations

The Gaming Commission promulgates these regulations to regulate sports betting at casinos located within the Tribe's jurisdiction.

§ 501 Definitions

The following words and terms, when used in this chapter, shall have the following meanings unless the context clearly indicates otherwise:

- (1) "Affiliate" means a person that, directly or indirectly, through one or more intermediaries, controls or is controlled by a sports betting operator.
- (2) "Applicant" means a person that applies for a license or for registration under these regulations. Applicant includes an affiliate, director, or managerial employee of the applicant that performs the function of principal executive officer, principal operations officer, or principal accounting officer, or a person who holds more than 5% ownership interest in the applicant. As used in this subdivision, affiliate does not include a partnership, a joint venture, a co-shareholder of a corporation, a co-member of a limited liability company, or a co-partner in a limited liability partnership that has 5% or less ownership interest in the applicant and is not involved in the internet sports betting operation.
- (3) "Athletic event" means a sports activity that involves the athletic skill of 1 or more players or participants. Athletic event does not include any of the following: (A) Horse racing if sports betting on that race is pari-mutuel; (B) Any sport or athletic event played by individuals that are at the high school level or below unless the majority of participants in the sport or athletic event are 18 years of age or older; (C) Roulette, poker, blackjack, a card game, a dice game, or any other game or contest typically offered in a casino other than sports betting; (D) A fantasy contest.
- (4) "Authorized Participant" means an individual who has a valid internet sports betting account with a sports betting operator and is at least 21 years of age. An Authorized Participant is not an owner, player, employee or contractor of a sports team betting on a team in the sports league wherein the owner, player or employee's team is participating.
- (5) "Board" means the Michigan gaming control board created under section 4 of the Michigan Gaming Control and Revenue Act.
- (6) "Casino" means a building or buildings in which gaming is lawfully conducted under the Michigan Gaming Control and Revenue or in which class III gaming is lawfully conducted by an Indian tribe in this state under a facility license issued in accordance with a tribal gaming ordinance approved by the chair of the National Indian Gaming Commission.
- (7) "Class III gaming" means that term as defined in 25 USC 2703.

(8) "Compact" means a tribal-state compact governing the conduct of gaming activities in this state that is negotiated under the Indian gaming regulatory act, Public Law 100-497, 102 Stat 2467.

(9) "Gaming Commission" is the Nottawaseppi Huron Band of the Potawatomi Gaming Commission which regulates the Tribe's Gaming Regulatory Act codified at 2 NHBPTC Section 8.5.

(10) "Gaming equipment" or "sports betting equipment" means any mechanical, electronic, or other device, mechanism, or equipment used in the operation of internet sports betting that directly affects the wagering and results of internet sports betting offered under this act. Gaming equipment does not include a personal computer, mobile phone, or other device that is owned and used by an individual to place an internet sports betting wager.

(11) "Independent Professional" means a nationally recognized testing laboratory approved to test gaming software, computers or other gaming equipment and systems by the Gaming Commission and the State of Michigan.

(12) "Indian lands" means that term as defined in 25 USC 2703.

(13) "Indian tribe" means that term as defined in 25 USC 2703 and any instrumentality, political subdivision, or other legal entity through which an Indian tribe operates its casino in this state.

(14) "In-game betting" means placing an internet sports betting wager after an athletic event has started.

(15) "Internet" means the international computer network of interoperable packet-switched data networks, inclusive of additional technological platforms, such as mobile, satellite, and other electronic distribution channels.

(16) "Internet sports betting" means operating, conducting, or offering for play sports betting through the internet.

(17) "Internet sports betting account" means an electronic ledger in which all of the following types of transactions relative to an authorized participant are recorded: (A) Deposits and credits; (B) Withdrawals; (C) Internet sports betting wagers; (D) Monetary value of winnings. (E) Service or other transaction-related charges authorized by the authorized participant, if any; (F) Adjustments to the account.

(18) "Internet sports betting platform" means an integrated system of hardware, software, or applications, including mobile applications and servers, through which a sports betting operator operates, conducts, or offers sports betting through the internet.

(19) "Internet sports betting platform provider" means a sports betting supplier that contracts with a sports betting operator to provide an internet sports betting platform.

(20) "Internet sports betting wager" means the cash, or cash equivalent, including free play, loyalty points, and other redeemable sports betting credits, risked by an authorized participant on sports betting through the internet.

(21) "Mobile application" means an application on a mobile phone or other device through which an individual is able to place an internet sports betting wager.

(22) "Nottawaseppi Huron Band of the Potawatomi Tribe" or the "Tribe" is a federally recognized Tribe located at the Pine Creek Reservation which owns and operates Firekeepers Casino Hotel near Battle Creek, Michigan.

(23) "Official league data" means statistics, results, outcomes, and other data relating to an athletic event obtained by a sports betting operator under an agreement with a sports governing body, or an entity expressly authorized by the sports governing body for determining the outcome of tier 2 sports bets.

(24) "Person" means an individual, partnership, corporation, association, limited liability company, federally recognized Indian tribe, or other legal entity.

(25) "Revenue Audit" means the casino department that completes daily audits of revenue generating departments for reporting and compliance purposes.

(26) "Sports betting" means to operate, conduct, or offer for play wagering conducted under this act on athletic events and other events approved by the board. Sports betting includes, but is not limited to, single-game bets, teaser bets, parlays, over-under, moneyline, pools, exchange betting, in-game betting, proposition bets, and straight bets. Sports betting does not include a fantasy contest.

(27) "Sports betting operator" means a person that is issued a sports betting operator license.

(28) "Sports betting operator license" means a license issued by the Commission to a person to operate, conduct, or offer internet sports betting.

(29) "Sports betting supplier" means a person that the Commission has identified under rules promulgated by the Commission as requiring a license to provide a sports betting operator goods or services regarding the operation of internet sports betting. Sports betting supplier includes, but is not limited to, internet sports betting platform providers.

(30) "Sports betting supplier license" means a license issued by the Commission to a sports betting supplier.

(31) "Sports betting wagering device" means a mechanical, electrical, or computerized terminal, device, apparatus, or piece of equipment used to place an internet sports betting wager. Sports betting wagering device does not include a personal computer, mobile phone, or other device owned and used by an individual to place an internet sports betting wager.

(32) "Sports governing body" means an organization that prescribes final rules and enforces codes of conduct for an athletic event and the participants in the athletic event.

(33) "Sports wagering kiosk" means an automated device that may be used for sports wagering voucher and ticket processing and automated functions as approved by the Commission.

(34) "Tier 1 sports bet" means an internet sports betting wager 1 that is not a tier 2 sports bet.

(35) "Tier 2 sports bet" means an internet sports betting wager that is placed after an athletic event has started.

(36) "Vendor" means a person that is not licensed under this act that supplies any goods or services to a sports betting operator or sports betting supplier.

(37) "Vendor Technician License" means a license issued by the Commission to a person engaged by a casino vendor to perform a task or tasks at a casino licensed by the Commission.

(38) "Winnings" means the total cash value of all property or sums including currency or instruments of monetary value paid to an authorized participant by a sports betting operator as a direct result of a winning sports betting wager.

§ 502 General requirements for Sportsbook and online Sportsbook

(a) Only a casino licensed by the Gaming Commission is permitted to engage in sports betting. A casino authorized to conduct an online Sportsbook shall comply with all applicable requirements of the Tribe's Gaming Regulatory Act and Michigan law which explicitly apply. A licensed casino may offer sports betting to Authorized Participants when meeting the requirements of Section 8-5-83 of the Tribe's Gaming Regulatory Act and these regulations. Only a casino in compliance with Michigan's Lawful Sports Betting Act (Michigan Statute 432.401 et seq.) is permitted to engage in online sports betting. For online sports betting, if Michigan law or regulation impose a stricter standard than these regulations, the stricter standard applies and is incorporated into these regulations for online sports betting.

(b) A casino offering a Sportsbook or online Sportsbook shall maintain a cash reserve of not less than the greater of \$500,000 or the amount necessary to ensure the ability to cover the outstanding Sportsbook and online Sportsbook liability.

(c) Each Sports betting operator shall, prior to commencing operations, and annually thereafter, perform a system integrity and security assessment conducted by an Independent Professional selected by the casino, subject to the approval of the Gaming Commission.

(d) The Independent Professional's report on the assessment shall be submitted to the Gaming Commission and shall include:

1. Scope of review;
2. Name and company affiliation of the individual(s) who conducted the assessment;
3. Date of the assessment;
4. Findings;
5. Recommended corrective action, if applicable; and
6. The operator's response to the findings and recommended corrective action.

(e) A Sports betting operator shall investigate each patron complaint and provide a response to the patron within five calendar days. For complaints that cannot be resolved to the satisfaction of the patron, related to patron accounts, settlement of bets, and/or illegal activity, a copy of the complaint and casino's response, including all relevant documentation, shall be provided to the Gaming Commission, at the written request of the patron. At the Gaming Commission's sole discretion, the Gaming Commission can consider the patron dispute on the written record or consider the patron dispute through an evidentiary hearing using the hearings process defined by Article X of the Tribe's Gaming Regulatory Act (GRA).

§ 503 Sportsbook license eligibility and approval

All agreements to operate a Sportsbook or online Sportsbook shall be approved by the Gaming Commission for a casino licensee.

§ 504 Sportsbook bets in a casino

(a) To conduct Sportsbook betting transactions, a casino shall have a cashier's cage that meets the requirements of 25 C.F.R. Section 543.18. Sportsbook betting transactions shall be conducted from:

1. A Sportsbook window in locations or areas as approved by the Gaming Commission;
2. Kiosks in locations as approved by the Gaming Commission; or
3. When the Sportsbook is closed, a designated window in the cashier's cage for the redemption of winning tickets only.

(b) In the exercise of reasonable due diligence, the casino shall not accept or pay bets from or to anyone other than a known Authorized Participants.

§ 505 Employees

A person directly involved in Sportsbook or online Sportsbook betting shall either be licensed as a casino key employee as defined in 25 C.F.R Section 502.14 or otherwise licensed by the Gaming Commission.

§ 506 Sportsbook and online Sportsbook integrity; confidential information

(a) Casinos shall have controls in place to identify unusual betting activity and report such activity.

(b) A casino receiving a report of suspicious event activity shall be permitted to suspend betting on events related to the report, delay payment of a winning bet, but may only cancel related bets after Gaming Commission Executive Director approval.

(c) The Gaming Commission and sports governing bodies shall be authorized to share information regarding the integrity of events conducted on a Sportsbook or online Sportsbook.

(d) All information and data received pursuant to this chapter by the Gaming Commission related to unusual or suspicious event activity shall be considered confidential and shall not be revealed in whole or in part, except upon the lawful order of a court of competent jurisdiction or, with any law enforcement entity, team, sports governing body, or regulatory agency that the Gaming Commission deems appropriate.

§ 507 Internal controls; house rules

(a) Casinos shall file with the Gaming Commission internal controls for all aspects of Sportsbook and/or online Sportsbook operations prior to commencing operations.

(b) In the event of a failure of the Sportsbook system's ability to pay winning bets, the casino shall have internal controls detailing the method of paying winning bets. The casino shall also file an incident report for each system failure and document the date, time, and reason for the failure along with the date and time the system is restored with the Gaming Commission.

(c) The internal controls shall address the following items regarding the Sportsbook system, at a minimum:

1. User access controls for all Sportsbook personnel;
2. Segregation of duties;
3. Automated and manual risk management procedures;
4. Procedures for identifying and reporting fraud and suspicious conduct;
5. Procedures to prevent betting by patrons prohibited from betting pursuant to this chapter;
6. Description of and compliance to anti-money laundering compliance standards;
7. Description of all types of bets available to be offered by the system; and
8. Description of all integrated third-party systems.

(d) The internal controls shall detail the reconciliation of assets and documents contained in a Sportsbook representative's drawer and Sportsbook kiosks.

(e) Sportsbook and online Sports betting operators shall adopt comprehensive house rules, which shall be approved by the Gaming Commission that include the following, at a minimum:

1. Method for calculation and payment of winning bets;
2. Effect of schedule changes;
3. Method of notifying patrons of odds or proposition changes;
4. Acceptance of bets at other than posted terms;
5. Expiration of any winning ticket one year after the date of the event;
6. Method of contacting the operator for questions and complaints;
7. Description of prohibited Sportsbook participants; and
8. Method of funding a bet.

(f) The house rules, together with any other information the Gaming Commission deems appropriate, shall be available in the Sportsbook, posted on the casino's internet website, and included in the terms and conditions of the account betting system and copies shall be made readily available to patrons.

§ 508 Sportsbook requirements

(a) The holder of a Sportsbook license shall be required to establish and maintain a first-class Sportsbook betting area as approved by the Gaming Commission. Satellite locations shall also be permitted with Gaming Commission approval.

(b) The Sportsbook shall:

1. be designed ensure maximum security and safeguarding of assets
2. include one or more Sportsbook employee windows, each of which shall contain: (A) a Sportsbook employee's drawer and terminal through which financial transactions related to sports betting will be conducted; and (B) manually triggered silent alarm systems equivalent to those used in casino's cages.
3. include surveillance cameras capable of accurate visual monitoring and recording of any activities, including the capturing of the patron's facial image when conducting transactions at the counter;
4. include a secure location for the purpose of storing funds issued to be used in the operation of the Sportsbook. The location shall:
 - A. be a fully enclosed room, located in an area not open to the public;
 - B. have a door with access restricted to pre-authorized employees;
 - C. have surveillance cameras capable of accurate visual monitoring and recording of any activities in the room.

(c) The Sportsbook shall have an operating balance of no more than \$1,000,000. Whenever the Sportsbook accumulates funds in excess of \$ 1,000,000, the excess funds shall be transferred to the cage no later than at the end of each shift. The funds will be transferred with appropriate documentation in a locked container by an employee of the Sportsbook. The employee and container shall be accompanied by a security officer. Prior to transporting the funds, security shall notify the surveillance department that the transfer will take place. The surveillance department shall monitor the transfer.

(d) The Sportsbook shall include signage for responsible gaming programs as may be required by the Gaming Commission and/or the Michigan Gaming Control Board.

§ 509 Sportsbook system requirements

(a) Prior to operating a Sportsbook, all equipment and software used in conjunction with its operation shall be submitted to the Gaming Commission for review and approved if the equipment and software meet the standards defined in Gaming Laboratories International (GLI) Event Betting Standards designated as GLI-33.

(b) The server or other equipment to accept bets at a Sportsbook shall be located within Michigan that conforms to the requirements of GLI-33. The server or other equipment used by a casino to accept bets at a Sportsbook or online Sportsbook shall conform to the requirements of GLI-33. In creating bets that will be offered to the public, a Sportsbook manager may receive advice and recommendations from any source or entity in other jurisdictions and may take into consideration information regarding odds and bets placed on sports events.

(c) A Sportsbook system submission shall contain a description of the risk management framework including, but not limited to:

1. User access controls for all Sportsbook personnel;
2. Information regarding segregation of duties;
3. Information regarding automated risk management procedures;
4. Information regarding fraud detection;
5. Controls ensuring regulatory compliance;
6. Description of anti-money laundering compliance standards;
7. Description of all software applications that comprise the system;
8. Description of all types of bets available to be offered by the system;
9. Description of all integrated third-party systems; and
10. Description of the method to prevent past posting.

(d) A Sportsbook shall maintain all transactional betting data for a period of 5 years.

(e) The house rules that apply to bets placed on a Sportsbook shall be readily available to the patron.

(f) A Sportsbook shall be capable of recording the following information for each bet made:

1. Description of event;
2. Event number;
3. Bet selection;
4. Type of bet;
5. Amount of bet;
6. Date and time of bet;
7. Unique bet identifier; and
8. An indication of when the ticket expires.

(g) In addition to the information above, all tickets generated by a cashier or at a kiosk shall include the following:

1. Name and address of the party issuing the ticket;
2. A barcode or similar symbol or marking as approved by the Gaming Commission corresponding to the unique bet identifier;
3. Method of redeeming winning ticket via mail if the casino permits redemption by mail; and
4. Cashier or kiosk generating the ticket.

(h) If the Sportsbook issues and redeems a voucher, the system shall be capable of recording the following information for each voucher:

1. Amount of voucher;
2. Date, time, and location of issuance;
3. Unique voucher identifier;
4. Expiration date of the voucher; and
5. Date, time, and location of redemption, if applicable.

(i) Sportsbook vouchers issued by a Sportsbook shall contain the following information:

1. Date, time, and location of issuance;
2. Amount of the voucher;
3. Unique voucher identifier;
4. Expiration date of the voucher;
5. Name of permit holder; and
6. An indication that the voucher can only be redeemed in exchange for a Sportsbook bet or cash.

(j) A Sportsbook that offers in-play betting shall be capable of the following:

1. The accurate and timely update of odds for in-play bets;
2. The ability to notify the patron of any change in odds after a bet is attempted;
3. The ability for the patron to confirm the bet after notification of the odds change; and
4. The ability to freeze or suspend the offering of bets, when necessary.

(k) A Sportsbook shall be capable of performing the following functions:

1. Creating bets;
2. Settling bets;
3. Voiding bets;
4. Cancelling bets; and
5. Preventing the acceptance of bets from patrons prohibited from betting pursuant to this chapter.

(l) A Sportsbook system shall be capable of accounting for lost, destroyed, or expired betting tickets.

(m) When a Sportsbook bet is voided or cancelled, the system shall clearly indicate that the ticket is voided or cancelled, render it nonredeemable, and make an entry in the

system indicating the void or cancellation and identity of the cashier or automated process.

(n) A Sportsbook shall prevent past posting of bets and the voiding or cancellation of bets after the outcome of an event is known.

(o) In the event a patron has a pending Sportsbook bet and is subsequently excluded or self excludes, a winning bet shall be paid. A bet placed by an excluded person after exclusion, the casino shall retain the bet proceeds.

(p) A Sportsbook shall, at least once every 24 hours, perform a self-authentication process on all software used to offer, record, and process bets to ensure there have been no unauthorized modifications. In the event of an authentication failure, at a minimum, the system shall immediately notify the casino licensee's Internet security officer (ISO) using an automated process. The ISO shall notify the Gaming Commission of the authentication failure within 24 hours. The results of all self-authentication attempts shall be recorded by the system and maintained for a period of not less than 90 days.

(q) A Sportsbook shall have controls in place to review the accuracy and timeliness of any data feeds used to offer or settle bets. In the event that an incident or error occurs that results in a loss of communication with data feeds used to offer or redeem bets, such error shall be recorded in a log capturing the date and time of the error, the nature of the error, and a description of its impact on the system's performance. Such information shall be maintained for a period of not less than six months.

(r) The licensee operating a Sportsbook shall provide access to betting transaction and related data as deemed necessary by the Gaming Commission in a manner approved by the Gaming Commission.

(s) A Sportsbook shall be capable of preventing any Sportsbook bet in excess of \$10,000 or making a payout in excess of \$10,000 until authorized by a supervisor.

(t) A Sportsbook shall be capable of maintaining the following:

1. Description of the event;
2. Event number;
3. Bet selection;
4. Type of bet;
5. Amount of bet;
6. Amount of potential payout or an indication that it is a pari-mutuel bet;
7. Date and time of bet;
8. Identity of the cashier accepting the bet
9. Unique ticket identifier;
10. Expiration date of ticket;
11. Patron name, if known;
12. Date, time, amount, and description of the settlement;

13. Location where the bet was made;
14. Location of redemption; and
15. Identity of cashier settling the bet if applicable.

(u) For all lost tickets that are redeemed, a Sportsbook shall record and maintain the following information:

1. Date and time of redemption;
2. Employee responsible for redeeming the ticket;
3. Name of patron redeeming the bet;
4. Unique ticket identifier; and
5. Location of the redemption.

§ 510 Betting on behalf of another prohibited

No licensee shall knowingly accept a bet from a person on behalf of any other person. No licensee shall knowingly allow a person to make a bet utilizing the account of another person. Messenger and agent transactions are prohibited.

§ 511 Patron bets

(a) A Sports betting operator shall not accept any bet on a sports event, unless it has provided written notification to the Gaming Commission of the first time that betting on a category of betting event (for example, betting on a particular type of professional sport) or type of bet (for example an in play bet or exchange bet) is offered to the public. Such notice shall be submitted prior to accepting a bet on such category of betting event and shall include the name of the sports governing body and a description of its policies and procedures regarding event integrity. Notice is not required whenever the odds change on a previously offered betting event. The Gaming Commission reserves the right to prohibit the acceptance of bets, and may order the cancellation of bets and require refunds on any event for which betting would be contrary to the public policies of the Tribe or State.

(b) After the exercise of reasonable due diligence, a bet shall only be accepted from an Authorized Participant. After the exercise of reasonable due diligence, a winning bet shall only be paid to an Authorized Participant.

(c) A casino shall only accept bets on betting events for which:

1. The outcome can be verified;
2. The outcome can be generated by a reliable and independent process;
3. The outcome is not affected by any bet placed; and
4. The event is conducted in conformity with all applicable laws.

(d) Patron bets shall only be made with:

1. Cash;
2. Credit cards as the law permits;
3. Promotional funds;

4. Sportsbook vouchers;
5. Any other means approved the Gaming Commission.

(e) The casino shall make sports book information available to the public.

(f) The maximum bet that may be accepted by any casino from a patron on any one sports event shall be limited to \$500,000.

(g) Winning betting tickets shall be redeemed by a Sportsbook representative or a Sportsbook kiosk after verifying the validity of the betting ticket through the Sportsbook system. The cashier or kiosk shall cause the system to electronically redeem and cancel the betting ticket upon redemption.

(h) A casino may allow a patron to redeem, by mail, a winning betting ticket to the address provided thereon in accordance with the casino's internal controls.

(i) A casino may, in its discretion, accept a layoff bet from another casino or Sportsbook. A casino placing a layoff bet shall disclose its identity to the casino or Sports betting operator accepting the bet.

§ 513 Sportsbook reports; betting revenue; reconciliation

(a) The Sportsbook system shall be designed to generate daily reports providing all essential information to ensure proper reconciliation and auditing of the daily functions of the Sportsbook. Reports shall contain all information as required by the Gaming Commission.

1. Summary and detail transaction reports-by location, cashier and event-which includes;

- A. Tickets sold;
- B. Tickets paid;
- C. Tickets voided;
- D. Vouchers issued;
- E. Vouchers redeemed; and
- F. Over or short amount to cashier's drawer;
- G. Ticket sales;
- H. Tickets paid;
- I. Tickets voided;
- J. Tickets canceled;
- K. Expired tickets; and
- L. Net Sportsbook gross revenue;

2. Detail reports of expired tickets and vouchers which for each expired ticket or voucher shall include, where applicable, the following:

- A. Ticket or voucher number;
- B. Date and time of issuance;

- C. Event;
- D. Bet description;
- E. Bet amount; and
- F. Payout amount;

3. Detail reports of voided and cancelled tickets which for each voided and cancelled ticket shall include, where applicable, the following:

- A. Ticket number;
- B. Date and time of issuance;
- C. Event;
- D. Bet description;
- E. Bet amount;
- F. Representative name or identification number; and
- G. Reason for void or cancellation;

5. Detail reports of outstanding liability for unredeemed tickets and vouchers which shall include the following:

- A. Ticket or voucher number;
- B. Date and time of issuance;
- C. Event;
- D. Bet description;
- E. Bet amount; and
- F. Status as pending or complete;

§ 514 Sportsbook kiosks.

(a) The casino may utilize Sportsbook kiosks for betting transactions within the casino's gaming floor. The casino may utilize kiosks outside the casino floor in a location approved by the Gaming Commission.

(b) A Sportsbook kiosk used in accordance with this section shall not:

- 1. Issue or redeem a Sportsbook voucher with a value of more than \$3,000;
- 2. Issue a ticket with a potential payout of more than \$10,000; or
- 3. Redeem a ticket with a value of more than \$3,000.
- 4. Redeem a ticket with a value, less the wager, of \$600 or more that is equal to, or greater than 300 times the wager.

(c) On a daily basis, a casino shall remove the bill validator boxes in the Sportsbook kiosks (the Sportsbook kiosk drop). The Sportsbook kiosk drop shall be monitored and recorded by surveillance. The casino finance employees independent of the Sportsbook operation (kiosk drop employee) shall remove the bill validator boxes in the Sportsbook kiosks. That process is called the Sportsbook kiosk drop. The Sportsbook kiosk drop shall be monitored and recorded by casino surveillance. The casino shall submit the Sportsbook kiosk drop schedule to the Gaming Commission, which shall include:

- 1. The time the drop is scheduled to commence; and
- 2. The number and locations of Sportsbook kiosks;

3. A proposed Sportsbook kiosk drop schedule of less than one time every 24 hours must be approved by the Gaming Commission prior to implementation.

(d) A security department member and the kiosk drop employee shall obtain the keys necessary to perform the Sportsbook kiosk drop in accordance with the casino's key sign-out and sign-in procedures.

(e) In the presence of a security department member, a kiosk drop employee shall complete the Sportsbook kiosk drop as follows:

1. Unlock the cabinet(s) housing the bill validator boxes;
2. Remove the bill validator boxes, place the removed bill validator boxes into a secured cart and insert the empty bill validator boxes;
3. Lock the cabinet(s) housing the bill validator boxes; and
4. Transport the secured cart to a count room or other location approved by the Gaming Commission for the count of the Sportsbook kiosk drop.

(f) The contents of the bill validator boxes shall be counted by one or more Finance employee independent of the Sportsbook who shall:

1. Document on a report the contents, by item and amount, for each box;
2. Prepare or generate a drop totals report that summarizes the total currency, and as applicable the Sportsbook tickets, and vouchers counted;
3. Transfer the currency to a main bank cashier with a copy of the drop totals report;
4. If applicable, transport the Sportsbook tickets and vouchers to a secured location approved by the Gaming Commission for storage until destroyed pursuant to casino's document destruction policy; and
5. Transport the reports to Revenue Audit.

(g) Revenue Audit shall reconcile the Sportsbook kiosks on a daily basis pursuant to internal controls. Any variance of \$500.00 or more shall be documented by Revenue Audit and reported in writing to the Gaming Commission within 72 hours of the end of the gaming day during which the variance was discovered. The report shall indicate the cause of the variance and shall contain any documentation required to support the stated explanation.

§ 515 Accounting controls for the sports betting location

(a) A Sportsbook representative shall begin a shift with an imprest amount of currency and coin to be known as the "imprest bank." No funds shall be added to or removed from the imprest bank during such shift, except:

1. In collection of Sportsbook bets;
2. In order to make change for a patron buying a sports betting ticket;
3. In collection for the issuance of sports betting vouchers;
4. In payment of winning or properly cancelled or refunded sports betting tickets;
5. In payment for sports betting vouchers;
6. To process simulcast transactions, provided that such transactions are separately reconciled;

7. In exchanges with the cashiers' cage, a satellite cage, or Sportsbook vault supported by proper documentation, which documentation shall be sufficient for Revenue Audit reconciliation purposes; or

8. A sportsbook employee may make in-shift deposits and withdraws of currency and coin as needed.

(b) The impress bank shall be placed in the drawer for the appropriate Sportbook window by the Sportsbook employee.

(c) At the conclusion of a Sportsbook employee's shift, the Sportsbook employee's remaining currency, coin and documentation shall be transported directly to the designated area for deposit.

(d) If the cash accountability for the shift as generated by the system does not agree with the net deposits, Revenue Audit shall record any overage or shortage. Revenue Audit shall apply all variance research and reporting procedures to the overage or shortage. Any discrepancy in excess of \$500.00 shall be reported to the Gaming Commission.