

# MISSOURI GAMING COMMISSION

## MINIMUM INTERNAL CONTROL STANDARDS CHAPTER H – CASINO CASHIERING AND CREDIT

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**§ 1 General**

- 1.01 Casino cashiering procedures for table fills and credits are included in Chapter D of the MICS.
- 1.02 Casino cashiering procedures for EGD ticket redemption, EGD coupons and hand-paid jackpot payouts are included in Chapter E of the MICS.
- 1.03 The procedures for the acceptance of drops for casino cashiering are included in Chapter G of the MICS.
- 1.04 All funds transferred between two cashiering locations, e.g., cage windows, slot wallets, Main Bank shall be counted by both individuals accountable for the funds involved in the transfer. Security escort requirements for the movement of funds are included in Chapter N of the MICS.
- 1.05 Casino cashiering procedures for wagering account and digital wallet transactions are included in Chapter U of the MICS.
- ~~1.0506~~ All assets shall be included on the accountability of the Main Bank, Floating Employee Window, or other cashiering location and shall be recorded on the count sheet for that location.
- ~~1.0607~~ Employees shall not be permitted to carry a pocketbook or other personal container into any cashiering area unless such container is transparent. All trash shall be placed in a transparent container or bag and shall be inspected for assets by security when removed from the cashiering area.
- ~~1.0708~~ All ingress and egress of the cage and Main Bank shall be recorded on an Ingress/Egress log, except for ingress and egress of MGC and cage/Main Bank personnel. The log shall include the escort signature and MGC number.
- ~~1.0809~~ In the event of a power outage or an emergency situation requiring evacuation, the cage and any other cashiering area shall remain locked.
- ~~1.0910~~ Each time a strap is removed, the contents shall be counted. When a new strap is applied, it shall be initialed and dated by the employee who counted and strapped the funds.
- ~~1.1011~~ Mechanical currency counting devices in use shall be adequately maintained to ensure the devices function correctly.

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**§ 2 Location and Functions**

- 2.01 The Internal Control System shall include a description of the locations and functions of all casino cashiering areas (casino cages, Main Bank/vault, poker cages, poker room banks, imprest wallets, etc.). The functions shall include a description of the various types of transactions performed by each casino cashiering area.
- 2.02 All cashiering areas shall be located on the casino floor. The Main Bank may be located off the casino floor with MGC approval.
- 2.03 Prior to accessing the funds of or adding funds to any cashiering location, the location shall be assigned to the accessing individual who shall count all the assets assigned to that location, including extra primary chips. This individual shall be responsible for all transactions occurring with the location until the final count sheet is prepared.
- 2.04 Unless directed by an MGC agent in a specific situation (e.g., arrest, eviction, or medical emergency) for a redemption transaction, the Class B Licensee shall not perform any transactions with patrons involving chips or tickets outside of the turnstiles.
- 2.05 Employees of the Class B Licensee shall not conduct chip or ticket exchanges on behalf of a patron in lieu of the patron presenting the chips at a cashiering location or a gaming table. This provision shall not prohibit redemption by mail or Security from exchanging chips or tickets at the casino cage for a patron at the direction of the MGC agent on duty.
- 2.06 The minimum required physical characteristics of casino cashiering areas shall be approved by MGC and shall include:
- (A) panic alarms at each casino cage window and in the Main Bank;
  - (B) surveillance coverage per 11 CSR 45-7.040 and all other fixed cashiering locations with sufficient clarity to permit identification of currency, chips, all documentation, employees and patrons;
  - (C) peephole, window, closed circuit television, or other observation method to identify persons attempting ingress at cages and the Main Bank/Vault from non-cashiering areas; and
  - (D) fixed physical barriers designed to prevent unauthorized access at the Main Bank, cage windows and all imprest bank locations which contain over \$20,000.

**§ 3 Imprest Bank Accountability** (11 CSR 45-8.080)

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- 3.01 Imprest banks are cashiering locations that contain a predetermined dollar value of gaming assets that are used on the gaming floor to perform cashiering functions.
- 3.02 Imprest banks shall only be used to conduct even exchanges and to accept documented tournament buy-ins, check cashing fees, ~~and~~ credit instrument payments, cashless deposits, and cashless withdrawals.
- 3.03 The dollar value of each type of imprest bank shall be listed on the Main Bank/Vault Accountability form. The Main Bank shall maintain a current listing of the imprest banks. Accounting shall maintain its own independent current list of imprest banks. Accounting shall update the list when imprest banks are transferred to and from the Main Bank or impressment levels are changed, as documented in the daily cage paperwork.
- 3.04 At any given time the dollar value of the cash, chips, and the dollar value indicated on the documentation of tickets, EGD jackpots, table fills, table credits, table game jackpots, coupons, checks, gift certificates, debit transactions, counter check issue slips, bad beat/special hand payouts, promotional prizes, and any other similar transactions documented on a pre-numbered form located in the bank shall total to the predetermined dollar value of the bank. The only exceptions are for tournament buy-ins, check cashing fees, ~~and~~ credit instrument payments, cashless deposits, and cashless withdrawals which ~~would~~ temporarily cause the bank to increase or decrease in value. All such documentation that was used in those transactions or supporting system reports shall be exchanged with the Main Bank to replace the assets in the bank or to sell the amount of the tournament buy-ins ~~and~~, check cashing fees, and/or cashless deposits, prior to the Cashier concluding his/her shift. Credit instrument payments shall be sold at the time of payment to the floating bank responsible for counter check accountability.
- 3.05 Unless otherwise approved by MGC, the assets for which the Cashiers are responsible shall be maintained on an imprest basis, except the Main Bank and employee window, and protected from unauthorized access.
- (A) Cashiers shall not share imprest banks.
- (B) Cashiers shall lock and secure any assets for which they are responsible when the assets are outside their direct physical control or viewable area.
- 3.06 Before redeemed tickets or EGD coupons are transferred from a cage window to the Main Bank, the Cashier shall:

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- (A) compare the physical tickets or EGD coupons being transferred to a printed automated system report of the total number and value of the tickets or EGD coupons redeemed at that window; or
- (B) generate an adding machine tape of the value of all tickets or EGD coupons redeemed to ensure the total matches the total on the system report.

Prior to reimbursing the Cashier, the Main Bank Cashier shall perform one of the aforementioned comparisons.

3.07 If a patron presents a ticket for redemption that is not recognized by the system or the on-line validation system is not functioning, the Cashier shall manually cancel the bar code by completely filling in one space of the bar code with a black permanent marker at the time of redemption.

3.08 Prior to the Cashier concluding his/her shift, the Cashier shall print a report(s) listing any wagering account or digital wallet transactions that he/she conducted during the shift. The report(s) shall be provided to the Main Bank Cashier and used to re-impress the window.

~~3.0809~~ At the end of each shift, the outgoing Cashier shall count all assigned assets and prepare and sign a Cashier/Bank Count Sheet listing the inventory. A reconciliation shall be performed of the opening imprest amount to the closing inventory total. Any variance shall be documented on the count sheet and Cage/Bank Variance Slip.

~~3.0910~~ A blind count shall be performed by the incoming Cashier. The incoming Cashier shall sign the completed count sheet attesting to the accuracy of the information in the presence of the outgoing Cashier. If there is no incoming Cashier, a Supervisor shall conduct the blind count and verification and sign the completed count sheet in the presence of the outgoing Cashier. A Main Bank Cashier may perform this verification if approved by MGC in the Internal Controls.

~~3.1011~~ If an imprest bank has not been opened for use, a Main Bank Cashier or Supervisor of the respective department shall count and verify the bank and complete a count sheet at least once every seven days. The count sheet shall have “verification only” on it. If any imprest banks, other than table banks and slot wallets, are maintained outside of the cage on the gaming floor, those banks shall be counted and verified at least once a gaming day.

~~3.1112~~ Overages and shortages per employee shall be documented on a Cage/Bank Variance Slip, which shall be signed by the responsible Cashier and either the Cashier Supervisor or Main Bank Cashier who verified the bank at the end of the Cashier’s shift. In addition:

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- (A) All variances in excess of \$20 shall be investigated and the result of the investigation shall be documented;
- (B) If there is a variance of \$500 or more the MGC Agent on Duty shall be informed before the Cashier leaves the cashiering location;
- (C) Variances in excess of \$20 shall be tracked by employee for at least the last 30 days. This report shall be updated daily;
- (D) The Internal Control System shall identify which job position is assigned the responsibility for tracking the variances; and
- (E) Repeated shortages by an employee totaling \$500 or more over any seven-day period shall be reported to MGC.

3.~~12~~<sup>13</sup> All forms shall be totaled, signed, dated, and shall include the time and location.

3.~~13~~<sup>14</sup> All count sheets shall be forwarded to the Main Bank at the end of each shift during which activity took place.

3.~~14~~<sup>15</sup> To ensure a proper segregation of duties, cage employees shall not create paid-ins or paid-outs or other similar documents to be used as the source document for transactions at frontline windows except for tournament buy-ins and redemption kiosk disputes.

**§ 4 Temporary Banks**

4.01 Temporary banks are funds that are temporarily issued to an employee to use for slot wallets, food and beverage banks or marketing events. The funds are issued from the employee window or Main Bank and returned to the same location, with all supporting documentation, at the end of the employee's shift. The Internal Control System shall identify all temporary banks and the functions performed by each. Temporary banks shall not exceed \$10,000. Temporary banks used for marketing events shall be subject to the security escort requirements set forth in Chapter N. Slot wallets that are maintained on an imprest basis and non-gaming banks which are issued and dropped to be counted by soft count are not considered temporary banks.

4.02 The issuance of the temporary banks shall be documented on a two-part Temporary Bank Voucher. The Main Bank Cashier/Employee Window Cashier issuing the funds and the employee receiving the funds shall both count the funds and sign the voucher attesting to the accuracy of the information. One copy of the form shall remain in the issuing bank and the other copy shall stay with the temporary bank.

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- 4.03 The employee responsible for the funds shall return the temporary bank at the end of the shift. The employee returning the funds and the Main Bank/Employee Window Cashier shall both count the funds. If the entire amount of the funds is not returned, other documentation that indicates the disbursement of the missing funds shall be provided to the Main Bank/Employee Window Cashier. The employee returning the funds and the Main Bank/Employee Window Cashier shall use the documentation, the funds returned or a combination of the two to reconcile the bank. The employee returning the funds and the Main Bank/Employee Window Cashier shall both sign the Temporary Bank Voucher attesting to the accuracy of the funds.
- 4.04 If a variance exists at the conclusion of the reconciliation, it shall be documented on a Cage/Bank Variance Slip and on the Temporary Bank Voucher and signed by the Main Bank/Employee Window Cashier and the employee returning the funds.
- 4.05 The balance of the temporary banks that have been issued shall be maintained on the Main Bank/Vault Accountability form / Employee Window Accountability form.
- 4.06 Temporary banks shall not be shared by employees.

**§ 5 Floating Employee Window**

- 5.01 The Class B Licensee may choose to operate one employee window with a floating balance on the gaming floor. This window and the Main Bank shall be the only cashiering areas that may operate with floating balances. The Class B Licensee may operate other employee windows that do not float.
- 5.02 On a per shift basis, all transactions that flow through the floating employee window and the inventory of the window shall be summarized on an Employee Window Accountability form. Any type of floating transaction recorded on the Employee Window Accountability form shall not also be recorded on the Main Bank/Vault Accountability form.
- 5.03 All transactions with the floating employee window shall be supported by documentation, except for even exchanges of currency of \$100 or less.
- 5.04 At the end of each shift, the outgoing Floating Employee Window Cashier shall count the inventory and record the inventory detail and the total inventory on an Employee Window Accountability form. The Floating Employee Window Cashier shall also record the amount of each type of accountability transaction, the opening balance, the closing

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balance and any variance between the counted inventory and the closing balance and shall sign the form.

- 5.05 Overages and shortages per employee shall be documented on the Employee Window Accountability form. All variances in excess of \$20 shall be investigated and the result of the investigation shall be documented. The MGC agent on duty shall be notified before the Floating Employee Window Cashier leaves the cashiering location if there is a variance of \$500 or more. Repeated shortages by an employee totaling \$500 or more over any consecutive seven-day period shall be reported to the MGC agent on duty.
- 5.06 A blind count of the floating inventory shall be performed by the incoming Floating Employee Window Cashier. This is the only employee authorized to conduct transactions from this window. The incoming Floating Employee Window Cashier shall sign the completed Employee Window Accountability form attesting to the accuracy of the information in the presence of the outgoing Floating Employee Window Cashier. If there is no incoming Floating Employee Window Cashier, a Cage Supervisor shall conduct the blind count and verification and sign the completed Employee Window Accountability form in the presence of the outgoing Floating Employee Window Cashier.
- 5.07 Copies of the Employee Window Accountability form and related documentation shall be forwarded to Accounting daily and posted to the general ledger at least monthly.

**§ 6 Main Bank Accountability**

- 6.01 The Class B Licensee shall operate a Main Bank with a floating balance. The Main Bank and floating employee window shall be the only cashiering areas that may operate with floating balances. The floating assets of the Main Bank shall be located in the vault or in the Main Bank. Any type of floating transaction recorded on the Main Bank/Vault Accountability form shall not also be recorded on the Employee Window Accountability form. The following transactions shall only be conducted by the Main Bank:
- (A) all buys from the count room;
  - (B) reconciliation and impressment of redemption kiosks; and
  - (C) transactions with financial institutions.
- 6.02 On a per shift basis, all transactions that flow through the Main Bank shall be summarized on a Main Bank/Vault Accountability form.
- 6.03 All transactions with the Main Bank shall be supported by documentation, except for even exchanges of currency of \$100 or less.

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- 6.04 At the end of each shift, the outgoing Main Bank Cashier shall count the floating inventory, record the inventory detail and the total inventory on a Main Bank/Vault Accountability form, and sign the form. The Main Bank Cashier shall also record the amount of each type of accountability transaction, the opening balance, the closing balance and any variance between the counted inventory and the closing balance. If there is more than one Main Bank Cashier working during a shift, each Cashier shall participate in the incoming count and the outgoing count for that shift and sign the form.
- 6.05 Overages and shortages per employee shall be documented on a Main Bank/Vault Accountability form. All variances in excess of \$20 shall be investigated and the result of the investigation shall be documented. The MGC agent on duty shall be notified before the Main Bank Cashier leaves the Main Bank if there is a variance of \$500 or more. Repeated shortages by an employee totaling \$500 or more over any consecutive seven-day period shall be reported to the MGC agent on duty. If more than one employee is working in the bank, each employee responsible for the variance shall be held accountable for the total of the variance in the bank.
- 6.06 A blind count of the floating inventory shall be performed by the incoming Main Bank Cashier(s). The incoming Main Bank Cashier(s) shall sign the completed Main Bank/Vault Accountability form attesting to the accuracy of the information in the presence of the outgoing Main Bank Cashier(s). If there is no incoming Main Bank Cashier, a Cage Supervisor shall conduct the blind count and verification and sign the completed Main Bank/Vault Accountability form in the presence of the outgoing Main Bank Cashier(s).
- 6.07 Copies of the Main Bank/Vault Accountability form and cashier count sheets and related documentation shall be forwarded to Accounting daily and posted to the general ledger at least monthly.
- 6.08 All funds received by the Main Bank shall be counted by a Main Bank Cashier prior to being used for subsequent Main Bank transactions.

**§ 7 Redemption Kiosks** *(Additional redemption kiosk standards are included in Chapter E of the MICS.)*

- 7.01 Redemption kiosks shall be maintained on an imprest basis on the Main Bank's accountability. Redemption kiosks may also perform ATM and check cashing functions as long as the ATM and check cashing functionalities are physically or logically

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separated from any critical IT system. [Cashless deposits and withdrawals shall only be conducted at kiosks that have been approved by MGC for that functionality.](#)

- 7.02 After a redemption kiosk has been filled to its recorded imprest level, it shall be dropped and reconciled within four days. If at any time, a cassette is replaced or added, the kiosk shall be counted down and reconciled within 24 hours. All counts shall be performed by the count team in the count room or by the Main Bank Cashier in the Main Bank, under dedicated surveillance coverage. If the count is performed in the count room the count and the transfer of the funds shall be documented on a two-part Funds Transfer Slip with one copy dropped in the accounting box and the original transferred with the funds. If the Main Bank Cashier performs the count, the count shall be documented and the documentation shall be signed by the Main Bank Cashier performing the count.
- 7.03 In order to reconcile the redemption kiosk, all cash, tickets and coupons remaining in the redemption kiosk shall be removed and counted. Coin shall be either estimated from the system report or removed and counted, but must be counted at least once every seven days. The total dollar amount of the tickets, coupons redeemed, ATM withdrawals, checks cashed, [cashless withdrawals](#), and point redemptions [minus any cashless deposits](#) shall be compared to the imprest amount, including any fills, less any remaining cash and coin in the kiosk. The report from the kiosk shall be used to determine the imprest amount and to identify any [cashless deposits](#), [cashless withdrawals](#), and fills which occurred since the last reconciliation. The Class B licensee’s internal controls shall identify the transactions performed by their kiosks.
- 7.04 The reconciliation of the redemption kiosk shall be performed by the Main Bank Cashier. If the count is conducted by a Main Bank Cashier, the reconciliation shall be performed by a different Main Bank Cashier. The reconciliation shall be documented and the documentation signed by the employee performing the reconciliation. The copy of the reconciliation paperwork shall be forwarded to Accounting with the daily Main Bank paperwork.
- 7.05 All variances over \$20 shall be documented on a form specified by the Internal Control System and investigated by a Cage Supervisor or Cage Administrator. The results of the investigation shall also be documented. The investigation shall be performed by the end of the gaming day following the day of the reconciliation. Any redemption kiosk variance of \$200 or more shall be immediately reported to the MGC agent on duty.
- 7.06 A designated area for the preparation of currency cassettes and a designated storage area for cassettes that contain cash shall be located in the Main Bank. Each area within the bank shall be described in the Internal Control System. The designated preparation area

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shall have overhead, dedicated surveillance coverage with sufficient clarity to identify the denomination of the currency being placed into the cassette along with the cassette number and denomination. If a color coding system is used to identify the denomination of the cassettes, the color coding system shall be defined in the Internal Control System. The storage area for the cassettes shall also have dedicated surveillance coverage to record the storage and retrieval of currency cassettes. The storage area shall be locked when cassettes are not being removed from or added to the area. Empty currency cassettes shall not be stored with the currency cassettes containing cash.

- 7.07 All currency cassettes used in redemption kiosks shall be filled with currency by a Main Bank Cashier. The amount of currency to be placed in the cassettes shall be counted by the Main Bank Cashier and placed in the cassette. A pre-numbered tamper resistant seal that secures the cash in each cassette shall be immediately placed on the cassette. Each seal shall have an unalterable unique number. The type of seal shall be approved by the MGC. Any cassette that contains money and is not immediately placed in the redemption kiosk shall be stored in the designated storage area.
- 7.08 A Currency Cassette Log shall be maintained and updated each time currency cassettes are sealed, as well as when placed, in the kiosks.
- 7.09 Each cassette shall be labeled with the required dollar denomination for that cassette and a unique cassette number. The label shall be legible to surveillance during the fill process.
- 7.10 Any individual transporting currency cassettes containing funds outside of the Main Bank shall be escorted by security and the funds shall be transported in a locked cart.
- 7.11 Only cassettes properly prepared and sealed in the Main Bank shall be used to place currency in the redemption kiosks. Currency shall not be added to cassettes which have been placed in a kiosk until reconciliation of that kiosk. The only time that a seal may be broken prior to the count and reconciliation is when there is a machine or cassette malfunction. If a seal must be broken before the redemption kiosk is reconciled due to a malfunction, the cassette shall be brought to the Main Bank or cage with security escort before the seal is broken. The seal shall be broken under surveillance coverage. Once the cassette is repaired the funds will be recounted and resealed by the Cashier and Cage Supervisor. This transaction shall be recorded on the Currency Cassette Log.
- 7.12 The individual(s) who removes the seals on the cassettes in order to perform the count of the cassettes shall record the seal number of all cassettes used in the redemption kiosk since the last reconciliation on the count and reconciliation documentation.

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- 7.13 The individual who conducts the kiosk count, reconciles the redemption kiosk, or investigates any kiosk variance shall not be one of the individuals who initially prepared the currency in any of the cassettes used in the redemption kiosk since the last reconciliation. The individual who conducts the kiosk count, reconciles the redemption kiosk, or investigates the variance shall compare the seal numbers recorded on the count and reconciliation documentation to the Currency Cassette Log to verify that he/she did not prepare any of the cassettes used in the redemption kiosk since the last reconciliation.
- 7.14 If cassettes need to be replaced during the gaming day before the redemption kiosk is dropped and reconciled, the individual cassettes that are replaced which still contain cash shall be locked in a storage area designated in the Internal Control System. When the redemption kiosk is dropped and reconciled these cassettes shall be included in the count and reconciliation. This storage area shall be separate from the storage of filled cassettes.

**§ 8 Even Exchanges between Cashiering Locations**

- 8.01 All even exchanges between cashiering locations, excluding slot wallets and even exchanges of currency of \$100 or less, shall be documented on at least a two-part Even Exchange Slip. One part shall remain at each cashiering location at the conclusion of the exchange.
- 8.02 Only positions designated in the job descriptions in the Internal Control System may process even exchange transactions between cashiering locations.
- 8.03 Each person involved in an even exchange between cashiering locations shall independently count the contents of the even exchange to ensure the amounts agree with the documentation before completing the transaction.
- 8.04 Exchanges shall not be conducted between cage frontline windows, except for even exchanges of currency. Exchanges from slot wallets shall not occur at a frontline cage window.

**§ 9 Chip Inventories** (11 CSR 45-5.140; -5.150; -5.160; -5.170; -8.040)

- 9.01 Value chip inventories shall be divided into the following:
- (A) Primary chips are those in current use;

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- (B) Reserve chips are excess chips which are dual locked in a separate compartment and may be placed into play as the need arises. Reserve chips are not required; and
  - (C) Secondary chips are a complete set of chips with different secondary colors that are held to replace the primary set when needed.
- 9.02 Non-value chip inventories shall be divided into the following:
- (A) Primary chips are those in current use;
  - (B) Reserve chips are a set of non-value chips with a design insert or symbol different from those non-value chips comprising the primary set. These chips are placed into service when the primary set is removed.
- 9.03 The MGC agent on duty shall be notified upon delivery of any gaming chips.
- 9.04 At least two employees from separate departments, as identified in the Internal Control System, shall inspect and inventory the chips received.
- 9.05 Any deviation between the invoice/packing slip amount or denomination and the actual chips received or any defects found in such chips shall be documented on the invoice/packing slip and promptly reported to the MGC agent on duty.
- 9.06 Chip inventory ledgers shall be maintained by Accounting to record, by denomination, the receipt, disbursement, and destruction of primary, secondary and reserve gaming chips. The Chip Inventory Ledger shall be a continuous document. The individuals who inspected and counted the chips shall either sign the inventory ledger or the supporting documentation. (11 CSR 45-5.140(2); 11 CSR 45-5.150(1); 11 CSR 45-5.160(1)).
- 9.07 The storage areas for the primary, secondary and reserve gaming chips, including measures used to secure the gaming chips and the individuals with access shall be described in the Internal Control System. Primary, secondary and reserve chips shall not be commingled and shall be locked in separate compartments.
- 9.08 Chips shall be removed from or returned to the secondary chip or reserve chip inventories in the presence of at least two employees, who shall be identified in the Internal Control System. The employees involved shall document the transaction on the Chip Inventory Ledger and shall sign the ledger.
- 9.09 Inventories of reserve and secondary chips shall be conducted on a monthly basis and the results of such inventories shall be recorded on forms as described in the Internal Control

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System. If these chips are locked in compartments that have been sealed by MGC, physical inventories shall be performed at least annually. Include procedures in the Internal Control System for sealing and accessing these locked compartments. Any discrepancies shall be investigated and reported to MGC. Inventories shall be made in the presence of MGC personnel.

- 9.10 Each Class B Licensee on a monthly basis shall compute and record the unredeemed liability for each denomination of chips. The Internal Control System shall include the formula used for computing the unredeemed liability and describe the documentation used to perform the calculation.
- 9.11 During non-gaming hours all chips, including value, non-value and tournament chips, shall be stored and locked in the appropriate storage cabinets in the casino cages, in Poker Banks, in table trays at the gaming tables, locked tip boxes, in the vault, or in the Main Bank.
- 9.12 Chips permanently removed from use shall be destroyed. At least 10 days prior to the destruction of chips, the Class B Licensee shall notify MGC and the MGC Boat Supervisor in writing of:
- (A) the date and location at which the destruction will be performed;
  - (B) the estimated quantity of chips;
  - (C) estimated dollar value of chips;
  - (D) the description and estimated quantity of non-value chips; and
  - (E) an explanation of the method of destruction.
- 9.13 The destruction of chips shall be performed in the presence of at least two individuals, one of whom shall be an agent of the MGC, unless otherwise authorized by MGC. The casino employee(s) involved shall document the transaction on the Chip Inventory Ledger and shall sign the ledger.
- 9.14 The Internal Control System shall include procedures for the removal and destruction of damaged chips from the casino inventory.

**§ 10 Safekeeping Deposits and Withdrawals**

10.01 The following types of safekeeping deposits are allowed:

- (A) A deposit made by a patron to withdraw at a later time;

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- (B) A deposit of a jackpot which could not be paid to the patron because the patron did not provide the required identification;
  - (C) A deposit of an EGD jackpot of \$1,200 or more when the winner of the jackpot is unknown or the jackpot was abandoned by the patron;
  - (D) A deposit of a table games jackpot when the winner of the jackpot is unknown or the jackpot was abandoned by the patron;
  - (E) A deposit made by the casino for funds owed to a patron whose identity is known (e.g., wire transfers); and
  - (F) A deposit of a partial payment on a counter check received by mail.
- 10.02 All jackpots, bad beat, and other promotional payouts which cannot be paid to the patron because the patron did not provide the required identification shall be placed in safekeeping.
- 10.03 Safekeeping deposits/withdrawals shall only be performed by the Main Bank Cashier or Floating Employee Window Cashier.
- 10.04 Upon deposit a Safekeeping Deposit/Withdrawal form shall be prepared. This form shall be at least a three-part form with one part going to the patron, one part remaining in the casino cage file and one part shall be included in the daily cage paperwork sent to Accounting. The Internal Control System shall include procedures for any voided forms.
- 10.05 If the patron is unable to provide adequate identification the Cashier will be allowed to accept a safekeeping deposit without verifying the patron's identification. However, identification information shall be obtained verbally from the patron. The MGC agent on duty shall be notified when there is inadequate identification. Partial payments of credit instruments by mail and abandoned jackpots may be placed into safekeeping without identification information.
- 10.06 At the time of deposit a clear copy of the patron's photo ID as provided by the depositing patron shall be obtained. If a clear copy of the patron's photo ID is not available, a clear surveillance photo of the person making the deposit shall be obtained. In the case of an abandoned jackpot, surveillance shall attempt to obtain a picture of the patron. A file shall be created for each deposit that includes the picture of the patron and the Safekeeping Deposit/Withdrawal form. If a picture was not obtained, it shall be documented as to why the picture was not included.
- 10.07 Either the Main Bank or the floating employee window shall maintain a Safekeeping Log as specified in the Internal Control System. The Safekeeping Log shall be a continuous document.

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- 10.08 The ending balance on the Safekeeping Log and all safekeeping deposits and withdrawals that occurred during the shift shall be recorded as separate line items on the Main Bank/Vault Accountability form or Employee Window Accountability form on a per shift basis.
- 10.09 Prior to conducting a safekeeping withdrawal, including partial withdrawals, the cashier shall:
- (A) obtain the patron’s valid, non-expired government-issued photo identification (such as a driver’s license, state ID card, or passport);
  - (B) confirm the patron’s identity by comparing:
    - (1) the photo, physical description and identifying information on the photo identification to the patron requesting the withdrawal;
    - (2) a copy of the photo ID or the surveillance photo in the safekeeping file to the patron requesting the withdrawal; and
    - (3) the customer’s signature obtained at the time of deposit on the Safekeeping Deposit/Withdrawal form to the signature on the photo identification, if available on the deposit form; and
  - (C) verify the patron is not a DAP or Excluded Person.
- 10.10 The Internal Control System shall include procedures for partial safekeeping withdrawals.
- 10.11 ~~In accordance with sections 447.500 through 447.595, RSMo, safekeeping~~Safekeeping deposits shall be delivered to the Missouri State Treasurer’s Office in accordance with the “Missouri Uniform Disposition of Unclaimed Property Act,” section 447.500 et seq., RSMo. If the deposit is a jackpot, appropriate taxes shall be withheld prior to delivering it to the state.
- 10.12 The patron, a Cashier and a Cage Supervisor shall sign the Safekeeping Deposit/Withdrawal form attesting to the accuracy of the information on the form upon both deposit and withdrawal.

**§ 11 Check Cashing Privileges**

- 11.01 The Internal Control System shall include:
- (A) the approval process for establishing check cashing privileges;

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- (B) the identification of any outside check guarantee service that is contracted by the Class B Licensee;
  - (C) the approval process for accepting individual checks, both in-house and through a check guarantee service, if applicable; and
  - (D) procedures to be followed if the check guarantee service is unavailable.
- 11.02 Licensees shall not cash any check from a disassociated person or an excluded person at the cage, or at a kiosk once the patron’s player account has been flagged.
- 11.03 Prior to accepting a personal check, licensees shall refer to the identification information of all persons who currently have an unsatisfied returned check either on the Returned Check Log or in the player tracking system. If the patron has an unsatisfied returned check, the licensee shall not permit the patron to cash any personal checks. The internal controls shall specify whether cashiers will check the Returned Check Log or the player tracking system to locate the identification information.
- 11.04 No third-party or payroll checks, except for the Class B Licensee’s payroll checks, may be cashed.
- 11.05 Only the following checks may be cashed at a casino cage with valid, non-expired government-issued photo identification:
- (A) personal checks, including DBA (Doing Business As) checks, as long as the individual presenting the check is named on the check;
  - (B) cashier’s checks;
  - (C) money orders;
  - (D) credit card advance checks;
  - (E) traveler’s checks;
  - (F) wire transfer service checks; and
  - (G) checks issued to a patron by the Class B Licensee or its parent company.
- 11.06 For all checks cashed, the Cashier shall:
- (A) verify the patron’s government-issued photo identification is valid and non-expired;
  - (B) confirm the patron’s photo, physical description and identifying information on the photo identification matches the patron presenting the check;
  - (C) verify the patron is not a DAP or Excluded Person;
  - (D) record the control number of the identification (i.e., driver license number) in a location specified in the internal controls; and

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- (E) count out the cash to the patron in full public view.
- 11.07 If personal checks other than electronic checks are cashed, the Cashier shall also:
- (A) immediately stamp the personal check “for deposit only”;
  - (B) time and date stamp the personal check; and
  - (C) write his/her initials and MGC license number on the personal check (the number may be system printed if generated by the Cashier’s logon).
- 11.08 If electronic checks which do not require the physical check to be deposited are cashed, the electronic check receipt shall be used as the source document to re-impress the window. Electronic checks shall be submitted to the Automated Clearing House (ACH) by the next banking day.
- 11.09 If the casino allows Cashiers to enter the amount of the check and print this amount on the check, the check shall be shown to the patron to confirm the amount is correct.
- 11.10 The check and the identification presented by the patron shall be placed on the counter face up to ensure surveillance coverage of the check and identification is obtained. For electronic checks, the electronic check receipt and the identification presented by the patron shall be placed on the counter face up to ensure surveillance coverage of the receipt and identification is obtained. When establishing an account for electronic check cashing, the patron’s voided check shall also be placed on the counter to obtain surveillance coverage.
- 11.11 The Class B Licensee shall deposit for collection all negotiable instruments, except credit instruments, by the next banking day following receipt. Failure to do so shall be considered an extension of credit pursuant to 313.812.9, RSMo.
- 11.12 Licensees shall not allow patrons to buy-back checks. Payment of an insufficient funds check shall not be considered a buy-back.
- 11.13 Check cashing may be performed at redemption kiosks as long as the patron enrolls at the cage prior to cashing checks at the kiosk. To enroll at the cage the patron shall present their valid, government-issued photo identification and the cashier shall verify the patron is not a DAP or Excluded Person. The patron shall confidentially create a personal identification number (PIN) ~~separate from the player’s club PIN~~. The PIN shall be masked from the cashier’s view. Once enrolled any check cashing at the kiosk shall require the patron to insert his/her player’s card and enter his/her PIN to verify the patron’s identity. Kiosk check cashing for a patron whose account has been flagged in the

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player tracking system as an Excluded Person or a Disassociated Person shall be suspended.

**§ 12 Returned Checks**

- 12.01 Accounting shall maintain a Returned Check Log listing each returned personal check that was not guaranteed by an outside check guarantee service for which the licensee had been notified of the non-payment or rejection of the check. The notification document shall be date-stamped with the current date promptly upon receipt. The Class B Licensee shall include all such unsatisfied checks on the Returned Check Log within three calendar days from the date the licensee received notice that the check was not accepted by the financial institution ordered in the check to make payment. The unsatisfied check shall remain on the Returned Check Log until the debt is paid in full or at least three years following the date of entry on the Returned Check Log.
- 12.02 The Class B Licensee shall make identification information of all persons who currently have an unsatisfied returned check on the Returned Check Log available to all of its employees who accept checks. This may be accomplished by flagging these patrons' accounts in the player tracking system, as long as the system is updated within three calendar days from the date the licensee received notice that the check was not accepted by the financial institution ordered in the check to make payment. The Class B Licensee and its employees shall not cash any further checks from any persons who have a check listed on the current Returned Check Log.
- 12.03 All returned checks which are the responsibility of the licensee shall be documented on the Returned Check Log. The Returned Check Log shall contain the following information:
- (A) the name and address of the person who presented the check;
  - (B) the date of the check;
  - (C) the amount of the check;
  - (D) the check number;
  - (E) the date the licensee received notification from a financial institution that the check was not accepted;
  - (F) date of entry on the Returned Check Log; and
  - (G) the date(s) and amount(s) of any payments received on the check after being returned by a financial institution.
- 12.04 Licensees who contract with a check guarantee service shall have all terms and conditions related to the check guarantee process included in the written contract. The

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contract shall include the requirement that a record of returned checks shall be provided to the MGC upon request. The records shall contain the amount, name of patron and date of each check.

- 12.05 If the Class B Licensee uses a check guarantee service, the Class B Licensee shall not accept a check that has been denied by the check guarantee service due to non-payment of a previous check. Once a Class B Licensee receives such a denial the licensee shall not accept any personal checks from that patron until approved by the check guarantee service.

**§ 13 Credit or Debit Cards**

- 13.01 The Internal Control System shall include procedures for authorizing and processing credit card cash advances and debit transactions.

- 13.02 Prior to completing credit card cash advances and debit transactions at the cage the Cashier shall:

- (A) verify the patron’s government-issued photo identification is valid and non-expired;
- (B) confirm the name, signature and other identifying information contained on the card, identification and transaction record all match;
- (C) confirm the patron’s photo, physical description and identifying information on the photo identification matches the patron presenting the card; and
- (D) verify the patron is not a DAP or Excluded Person.

- 13.03 The patron’s identification, the credit or debit card, and the transaction documentation shall be placed on the counter face up to ensure surveillance coverage is obtained. The cashier shall count out the cash to the patron in full public view.

**§ 14 Other Cage Transactions**

- 14.01 The Internal Control System shall include procedures for the acceptance of foreign currency or shall state that no foreign currency will be accepted.

- 14.02 Chips and tickets totaling up to \$1,000 may be redeemed by mail if approved in the Internal Control System. If such redemption is allowed, it shall be performed only by a Cage Supervisor or above. The Class B Licensee shall issue a check to the patron in the amount of the chips and tickets surrendered. The licensee is required to maintain a

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redemption log of these transactions. Gaming chips and tickets, excluding promotional tickets, shall not be sold or distributed to patrons by mail.

- 14.03 The Internal Control System shall include procedures for the acceptance of tournament buy-ins. Tournament buy-ins shall be transferred to the Main Bank prior to the end of the cashier's shift.
- 14.04 Checks shall not be issued from the cage in exchange for cash, unless the cash was just received from winnings at the casino.
- 14.05 Class B Licensees will take reasonable action to identify, locate, and notify the proper owner of unclaimed jackpots, unclaimed credits on an EGD, cash, chips, and EGD tickets found unattended regardless of where found on the property.
- 14.06 An unclaimed property account shall be maintained at the Main Bank or floating employee window and shall be included as a separate line item on either the Main Bank/Vault Accountability form or the Employee Window Accountability form as an accountability transaction on a per shift basis. A separate Unclaimed Property Log shall be maintained by the cashier on a per shift basis that includes the opening balance of the unclaimed property, the dollar amount of the transactions that occurred during the shift, the total dollar amount for the shift, and the ending balance. This form shall track the running total of unclaimed property for the Class B Licensee. One log may be used for the entire day with the required information listed by shift. The Class B Licensee shall process found tickets, chips, and cash as unclaimed property in accordance with [the "Missouri Uniform Disposition of Unclaimed Property Act,"](#) sections 447.500 through 447.595 et seq., RSMo, and may enter into an agreement with the State Treasurer's Office to transfer the funds at an earlier date.
- 14.07 If the owner of found cash, chips, unclaimed credits, or ~~EGD~~ tickets is identified and the item is valued at \$10 or more, the funds shall be placed in safekeeping for return to the owner. If the value is less than \$10, the funds shall be processed as unclaimed property or placed in safekeeping. If the owner is not identified, the funds shall be processed as unclaimed property, regardless of the amount. The Class B Licensee may choose to have one or more clear locked boxes for depositing any of these items with a value less than ten dollars for which the owner cannot be found. These items shall be processed by the end of the gaming day in the presence of the Cage Supervisor and one other cage employee. The deposit shall be documented on a form specified in the internal controls and the form shall be signed by both the Cage Supervisor and the cage employee. The boxes shall be permanently located at or near the employee window or Main Bank and

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have dedicated surveillance coverage. The key shall be a sensitive key only accessible to the Cage Supervisor.

- 14.08 All found tickets, for which the owner could not be determined, shall be redeemed at an imprest cage window and the cash transferred to the Main Bank or floating employee window as unclaimed property.
- 14.09 All credits left on an EGD, for which the owner could not be determined, shall be cashed out and redeemed at the cage and the cash transferred to the Main Bank or floating employee window as unclaimed property.
- 14.10 All abandoned or unclaimed EGD jackpots less than \$1,200 shall be processed and the cash transferred to the Main Bank or floating employee window as unclaimed property. All abandoned or unclaimed EGD jackpots of \$1,200 or more shall be processed and the cash transferred to the Main Bank or floating employee window as a safekeeping deposit.
- 14.11 All abandoned or unclaimed table game jackpots and poker payouts shall be processed and the cash transferred to the Main Bank or floating employee window as a safekeeping deposit.

**§ 15 Chips Accepted as Payment for Food or Beverages**

- 15.01 Value chips of \$100 dollars or less may be accepted as payment for food or beverage on the gaming floor. All value chips accepted as payment for food or beverages shall be exchanged for cash at the cage or Main Bank during the same shift in which they were accepted as payment from the patron. Any change due back to the patron shall be provided in currency.
- 15.02 Non-value (roulette) and tournament chips shall not be used for purposes other than wagering on the approved gambling game.
- 15.03 A sign shall be posted and remain posted in a prominent place near each entrance to the casino floor stating, “State law prohibits the use of gaming chips for purchases off the gaming floor.”

**§ 16 Exchange and Storage of Foreign Chips** (11 CSR 45-5.130)

- 16.01 Foreign chips inadvertently received in the table drop shall be recorded as revenue for tax remittal Adjusted Gross Receipt purposes.

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- 16.02 Foreign chips shall be separated from the Class B Licensee’s chips and stored in a locked compartment in the Main Bank/Vault. The Internal Control System shall describe procedures for the storage and accountability concerning foreign chips.
- 16.03 Class B Licensees exchanging foreign chips with other casinos shall ensure the employee performing the exchange is independent of the transaction.
- 16.04 Foreign chips shall only be exchanged for an equal value of the Class B Licensee’s chips, check or cash.
- 16.05 The Class B Licensee shall maintain documentation of the exchange of foreign chips. The documentation shall include the signatures of all the individuals involved in the exchange and an inventory of all the items exchanged.

**§ 17 Coupons** (11 CSR 45-5.181)

Unless otherwise noted, the following standards apply to all coupons, including EGD coupons.

- 17.01 A promotional coupon is any instrument offering any person something of value and issued by a Class B Licensee to entice the person to come to the Class B Licensee’s premises or for use in or related to licensed gambling games at a licensee’s gaming establishment.
- 17.02 The Class B Licensee may only redeem coupons issued by the Class B Licensee for that specific gaming facility or coupons issued by a sister property in Missouri within the same parent company. If the Class B Licensee redeems coupons from a sister property, an automated tracking system shall be used to verify coupons are authentic and to simultaneously cancel each redeemed coupon in the automated system at all such sister properties upon redemption of the coupon. A description of the automated tracking system and procedures for its use shall be included in the Internal Control System.
- 17.03 To ensure a proper segregation of duties, unredeemed coupons which are redeemable at the cage shall not be issued by cage employees. These coupons shall not be accessible to Cage Cashiers until presented for redemption by a patron. If these coupons are stored in the Main Bank or cage, they shall be locked in a secure area and the key to the area must be only accessible to marketing employees. The coupons must be inventoried by Accounting at least once each calendar month. An inventory log shall be maintained for the coupons. An entry documenting the inventory shall be clearly identifiable on the log.

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- 17.04 If the casino allows coupons to be printed to replace coupons sent by mail, the Internal Control System shall include the procedures for this process. Cashiers shall not be allowed to replace/exchange coupons that are redeemable in the cage.
- 17.05 Coupons for cash or chips shall only be exchanged at a cage, except for cashable EGD coupons, which may also be redeemed at an EGD or kiosk. Non-cashable coupons for EGD credits shall only be redeemed at EGDs.
- 17.06 Match play coupons and non-negotiable table games coupons shall not be accepted at the cage.
- 17.07 Coupons not designed to be electronically cancelled shall be cancelled by marking redeemed or by lining through the face of the coupon with a black permanent marker upon receipt from the patron.
- 17.08 When a coupon with a bar code is presented for redemption, the Cashier shall scan the bar code via an optical reader or input the coupon validation number manually. Prior to redeeming the coupon, the Cashier shall ensure the coupon is valid and has not previously been redeemed in the system.
- 17.09 Coupons that can be electronically cancelled shall immediately, upon redemption, be moved from an unpaid or unredeemed status to a paid or redeemed status.
- 17.10 All coupons redeemed at locations other than EGDs shall be forwarded to the casino Accounting department on a daily basis.

**§ 18 Electronic Gaming Device (EGD) Coupons** (11 CSR 45-5.181)

- 18.01 EGD coupons are coupons designed to be accepted at EGDs or redemption kiosks.
- 18.02 Cashable EGD coupons shall not be redeemed by mail.
- 18.03 When a cashable EGD coupon is presented for redemption, the Cashier shall:
- (A) scan the bar code via an optical reader or equivalent or input the EGD coupon validation number manually;
  - (B) verify the EGD coupon is valid and has not previously been redeemed;
  - (C) redeem the EGD coupon; and
  - (D) pay the patron an amount of cash or chips or a combination thereof equal to the specific value of the EGD coupon surrendered.

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- 18.04 Transaction detail reports for EGD coupons redeemed, at a minimum, shall contain the following printed information:
- (A) machine or validation terminal number;
  - (B) validation number;
  - (C) date and time paid;
  - (D) amount; and
  - (E) Cashier identifier.
- 18.05 The Class B Licensee shall immediately notify the MGC agent on duty of any:
- (A) incident of a coupon being presented for redemption which the validation system indicates has already been redeemed; or
  - (B) evidence that a coupon has been counterfeited, tampered with, or altered in any way which would affect the integrity, fairness, reliability or suitability of the coupon.
- 18.06 In situations where a cashable EGD coupon for which validation information cannot be accessed from the system or for which no validation information exists is presented for payment the Cashier shall:
- (A) manually override or redeem the coupon for valid transactions;
  - (B) stamp the coupon as redeemed upon payment to the patron;
  - (C) segregate coupons which are unredeemed in the system from system redeemed coupons;
  - (D) electronically verify and cancel the coupons when the Promotional Validation System is restored following manual override procedures; and
  - (E) disable the bar code on the coupon by completely filling in at least one space of the bar code with black permanent marker upon redemption.
- 18.07 Before redeemed cashable EGD coupons are transferred from a cage window to the Main Bank, the Cashier shall:
- (A) compare the physical coupons to a printed automated system report of the total number and value of the EGD coupons redeemed at that window; or
  - (B) generate an adding machine tape of all EGD coupons redeemed to ensure the total matches the total on the report.

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Prior to reimbursing the Cashier, the Main Bank Cashier shall perform one of the aforementioned comparisons.

**§ 19 Ticket In/Ticket Out (TITO)**

Additional redemption kiosk standards are included in Chapter E of the MICS.

- 19.01 Patrons' tickets shall be redeemed at a frontline cage window, redemption kiosk, or an EGD. Tickets presented for redemption, whether by a Cashier or through insertion into the bill validator of a participating EGD or other approved redemption device, shall immediately upon validation be moved from an unpaid status to a paid status in the system.
- 19.02 When a Ticket is presented for redemption, the Cashier shall —
- (A) scan the bar code via an optical reader or input the ticket validation number manually;
  - (B) verify the ticket is valid and has not previously been redeemed;
  - (C) redeem the ticket; and
  - (D) pay the patron an amount of cash or chips or a combination thereof equal to the specific value of the ticket surrendered.
- 19.03 Transaction detail reports for tickets redeemed, at a minimum, shall contain the following printed information:
- (A) machine or validation terminal number;
  - (B) validation number;
  - (C) date and time paid;
  - (D) amount; and
  - (E) Cashier identifier.
- 19.04 The validation system or slot accounting system must have the ability to identify invalid tickets and notify the Cashier that one of the following conditions exists:
- (A) Validation number cannot be found on file (forgery, etc.);
  - (B) Ticket has already been redeemed; and/or
  - (C) Amount on ticket differs from amount on file.
- 19.05 The Class B Licensee shall immediately notify the MGC agent on duty of any:

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- (A) incident of a ticket being presented for redemption which the validation system indicates has already been redeemed; or
- (B) evidence that a ticket has been counterfeited, tampered with, or altered in any way which would affect the integrity, fairness, reliability or suitability of the ticket.

19.06 The Class B Licensee shall establish procedures in their internal controls for situations where a ticket for which validation information cannot be accessed from the system or for which no validation information exists is presented for payment. Procedures shall include:

- (A) security and slot department personnel checking the machine log to verify the transaction when the ticket presented exceeds an established dollar amount set forth in the Class B Licensee's Internal Control System, not to exceed \$500 (tickets for the established dollar amount or less may be paid by a Cage Cashier or slot attendant from their imprest funds without checking the machine log, provided, however, tickets paid by slot attendants shall be signed by both the slot attendant and the patron receiving payment, then immediately taken by the slot attendant to a Cage Cashier who shall reimburse the slot attendant in cash for the face amount of the ticket, and then process the ticket in accordance with the procedures approved for items (C) and (D) of this subsection);
- (B) stamping the ticket as redeemed upon payment to the patron;
- (C) the segregation and security of tickets that have been paid but not redeemed in the system;
- (D) immediate notification of the MGC agent on duty for those transactions which cannot be verified by the end of the cashier's shift;
- (E) provisions for the electronic verification and cancellation of tickets when communication is restored and off-line data is communicated to the validation system following manual override procedures;
- (F) preparation of a machine tape for by each Cashier of the total number and value of all such tickets redeemed during the shift; and
- (G) disabling any such ticket by completely filling in at least one space of the bar code with black permanent marker by the end of the cashier's shift and before it is transferred to the Main Bank Cashier.

19.07 Whenever missing validation information occurs an investigation shall be launched within 72 hours and completed within a seven-day period. The investigation shall be documented. The results of the investigations completed during the gaming week shall be forwarded to the MGC Boat Supervisor and the MGC EGD Department on a weekly

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basis. Any machine experiencing more than three malfunctions within the gaming week shall be placed out of service until inspected by the MGC EGD department.

- 19.08 At a minimum, the following reports shall be generated at the end of each gaming day and reconciled with all validated/redeemed tickets:
- (A) Ticket Issuance Report;
  - (B) Ticket Redemption Report;
  - (C) Ticket Liability Report;
  - (D) Ticket Drop Report;
  - (E) Transaction Detail Report – available from the validation system that shows all tickets generated by an EGD and all tickets redeemed by the validation terminal or other EGD; and
  - (F) Cashier Report – to detail sum of tickets paid by Cashier or validation unit.

**§ 20 Wire Transfers**

- 20.01 The Class B Licensee may accept wire transfers at the request of a patron. A Main Bank Cashier or Floating Employee Window Cashier shall prepare a two-part Wire Transfer Form to document the transaction.
- 20.02 The wire transfer shall be initiated by the patron’s financial institution and processed by a Main Bank Cashier or Floating Employee Window Cashier. Upon receiving a request to process a wire transfer, the Main Bank Cashier or Floating Employee Window Cashier shall—
- (A) confirm the patron is not a DAP or an excluded person by performing the searches required in MICS Chapter Q. If the patron is a DAP or excluded person the transaction shall be denied and the funds returned to the originating account. The MGC shall be notified if the individual is present; and
  - (B) use the information provided from the Class B Licensee’s financial institution to confirm the:
    - (1) name on the account matches the name of the requesting patron;
    - (2) amount of the transfer matches the amount the patron requested; and
    - (3) transaction number matches the transaction number provided by the patron.
- 20.03 A Cage Supervisor shall confirm the receipt of the wire transfer with the casino’s financial institution ensuring the transaction number and amount match the information recorded on the Wire Transfer Form. Once confirmed, the Cage Supervisor shall add the

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date and time of confirmation on the Wire Transfer form and sign the form. Upon verifying receipt of the wire transfer, the cashier responsible for safekeeping shall create a separate safekeeping account for the patron and deposit the amount indicated on the Wire Transfer Form in the account, unless the wire transfer is for a counter check payment. A Safekeeping Deposit/Withdrawal Form shall be completed with the available information. The Wire Transfer Form shall be signed by the Main Bank Cashier/Floating Employee Window Cashier. The original Wire Transfer Form shall be retained with the Safekeeping Deposit Withdrawal form until signed by the patron. A copy of the Wire Transfer Form shall be forwarded to Accounting in the daily paperwork to support the safekeeping deposit.

- 20.04 After the safekeeping account is established, the funds shall be available in the cage. Prior to releasing any of the funds, the Main Bank Cashier/Floating Employee Window Cashier shall—
- (A) require the patron to sign the Wire Transfer Form;
  - (B) follow the established procedures for a safekeeping withdrawal; and
  - (C) obtain a clear copy of the patron’s valid non-expired government-issued photo identification to maintain with the Safekeeping Deposit/Withdrawal form.
- 20.05 If a wire transfer is for a counter check payment the cashier responsible for counter check accountability shall process the payment.
- 20.06 Employees processing wire transfers shall ensure wire transfers are only conducted from personal accounts or personal accounts with a DBA, as long as the individual requesting the transfer is named on the account.
- 20.07 The daily accounting audit shall require an Accounting representative to—
- (A) verify the receipt of the wire transfer;
  - (B) ensure the amount wired is equal to the value of the safekeeping deposit;
  - (C) ensure the amount wired is properly reflected on the Accountability form for that cashiering location; and
  - (D) verify the name on the safekeeping account matches the name of the patron who initiated the wire transfer.
- 20.08 If permitted by the Class B Licensee, a patron who had an incoming wire transfer may request to send the funds generated from gaming activities and remaining funds in the safekeeping account from the original wire transfer back to the originating account. Only funds remaining from the original transfer and funds generated from gaming activities

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may be wired back. The Main Bank Cashier/Floating Employee Window Cashier shall initiate this transaction by completing a Wire Transfer Return Form. The Cage Supervisor shall review the Wire Transfer Return Form and verify the funds in the Safekeeping account. Once the funds are verified, the Cage Supervisor shall sign the form. The Main Bank Cashier/ Floating Employee Window Cashier shall deduct the amount requested from the safekeeping account, sign the form, and forward the Wire Transfer Return Form to the Accounting department. A staff accountant, independent of the daily audits, shall verify the amount of funds, initiate the wire transfer, and sign the form. A transaction detail report shall be printed and attached to the Wire Transfer Return Form, which shall be held in the daily paperwork. During the daily audit, an Accounting representative independent of the wire transfers shall verify the wire transfer with the bank to ensure the funds were transferred to the correct account in the appropriate amount.

- 20.09 The Class B Licensee shall not wire transfer funds to patrons other than to return previously wired funds which have not been withdrawn and any associated funds generated from gaming activities.

**§ 21 Credit Issuance**

21.01 A Class B Licensee may offer credit to qualified persons who have an approved and signed credit application on file. “Qualified person” means a person who has completed a credit application provided by the Class B Licensee and who is determined by the licensee, after performing a credit check and applying usual standards to establish creditworthiness, to qualify for a line of credit in an amount to be determined by the licensees based on the person’s demand deposit accounts including any checking account or savings account, subject to the following restrictions:

- (A) Credit instruments of ten thousand dollars or less may be accepted only if the licensee determines the qualified person’s creditworthiness to be at least twice the amount of the credit instrument or ten thousand dollars, whichever is less; and
- (B) Credit instruments of more than ten thousand dollars may be accepted only if the licensee determines the qualified person’s creditworthiness to be equal or in excess of the amount of the credit instrument.

21.02 If any portion of a credit transaction is conducted by one of the Class B Licensee’s affiliated companies, the Class B Licensee shall include in the Internal Control System the identity of the affiliated companies and detailed procedures to ensure compliance with all applicable Statutes, Rules and Minimum Internal Control Standards.

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- 21.03 Credit issued from the cage shall be conducted only by a front line window cashier or by the cashier responsible for credit instrument accountability.
- 21.04 The internal controls shall list the credit limit amount which can be approved by job title in this section. The internal controls shall also specify those positions with authority to receive, process, and verify credit applications. Employees who are responsible for receiving, processing, or verifying credit applications shall not have authority to approve credit limits.
- 21.05 Prior to the issuance of credit, the employee issuing the credit shall determine if credit is available for that person.
- 21.06 The employee accepting a credit instrument shall not be the employee who approved that person's credit limit.
- 21.07 The internal controls shall describe the procedures for increasing credit limits. Once the licensee makes the determination that a person is a qualified person, additional credit checks are not required. However, if the licensee determines that it wants to perform a re-verification of the credit information, then the criteria used to determine when re-verification is required shall be included in the procedures. The procedures shall identify which job positions are authorized to increase credit limits. The job positions responsible for approving increases shall not be the same job position(s) that are responsible for verifying or re-verifying the information in the credit application. Increases to credit limits shall be documented in the credit files. (11 CSR 45-8.141)
- 21.08 Prior to issuing credit, the cashier shall:
- (A) Verify the person's identity by:
    - (1) obtaining the person's valid, non-expired government-issued photo identification (such as a driver's license, state ID card, or passport); and
    - (2) confirming the person's identity by comparing the photo, physical description, and identifying information on the photo identification to the person requesting the credit;
  - (B) Either retain a copy of the identification or verify a copy of the identification is on file;
  - (C) Verify the person is not a DAP or Excluded Person; and
  - (D) Examine the person's credit file to verify the requested credit does not exceed the approved credit limit. If it does exceed the limit, obtain the required authorizations for the extension of credit.

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21.09 To process a counter check the cashier shall:

- (A) Prepare the counter check for the patron’s signature by recording the following information:
  - (1) The name of the patron exchanging the counter check;
  - (2) The current date and time;
  - (3) The amount of the counter check (alpha and numeric);
  - (4) The cage window number, if applicable;
  - (5) The signature of the cashier;
- (B) Present the original and the issue slip of the counter check to the patron for signature;
- (C) Receive the signed counter check directly from the patron and verify the signature matches the signature on the identification presented by the patron at the time of issuance;
- (D) Stamp the back of the original counter check “For Deposit Only” if the counter check is not pre-printed with this statement;
- (E) Issue a counter check receipt to the patron that contains the information printed on the counter check. If processed by a front line window cashier, the original and payment slip of the counter check shall be transferred to the floating bank responsible for counter check accountability by the end of the cashier’s shift. The issue slip shall be sold to the main bank or floating employee window to reimpress the window. The original and payment slip shall be maintained and controlled by the floating bank responsible for counter check accountability; and
- (F) Count out the cash or chips to the patron in full public view in exchange for the counter check.

21.10 The Counter Check Accountability form shall be maintained by the Main Bank Cashier or Floating Employee Window Cashier on a per shift basis and updated each time a counter check or payment is received in the bank. Credit transactions shall also be recorded on the Main Bank Accountability form or the Floating Employee Window Accountability form.

21.11 If credit instruments other than counter checks are accepted by the Class B Licensee, the Class B Licensee shall include in its internal controls procedures for processing those instruments. The procedures shall include the documentation required, signatory requirements, distribution of forms, required inventories, accountability for the instruments, and any Accounting reconciliations. Procedures shall ensure credit instruments are due no later than 30 days from the date the credit was extended.

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- 21.12 The following information for counter checks shall be maintained, either manually or in the computer system:
- (A) signature of the employee(s) issuing the counter check (may be generated from login);
  - (B) name of the person receiving the credit;
  - (C) date and time the credit was issued;
  - (D) amount of credit issued;
  - (E) counter check number;
  - (F) amount of credit remaining after each issuance;
  - (G) date, time, and amount of payment received and nature of settlement (e.g., new counter check number, currency, or chips);
  - (H) name of person making payment; and
  - (I) signature of the employee receiving payment or settlement.
- 21.13 The counter check shall be, at a minimum, in triplicate form, pre-numbered or numbered by the printer, and shall be used in numerical sequence. Manual counter checks may be issued in numerical sequence by location. The three parts of the cage-issued counter check shall be utilized as follows:
- (A) the original slip shall be maintained until settled (e.g., paid in full, replaced, discounted, deposited);
  - (B) the payment slip shall be maintained until the counter check is paid or replaced due to partial payment; and
  - (C) the issue slip shall be maintained until forwarded to Accounting.
- 21.14 All counter checks prepared by computer shall be printed with an original and all copies. The information printed on the original counter check and other copies shall be the same and shall be stored in a machine-readable format. After preparation of a counter check, the stored data shall not be susceptible to change or removal by any personnel.
- 21.15 All counter checks prepared manually shall permit an individual to write on the original slip of the counter check and all of the other copies simultaneously.
- 21.16 The Counter Check Log shall be maintained by numerical sequence for all counter checks, including those issued or voided in the pit, indicating—
- (A) counter check number;
  - (B) name of person;
  - (C) date counter check issued;

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- (D) date paid; and
- (E) method of payment.

21.17 Voided counter checks shall be date and time stamped at the time of the void. The original and all copies of each voided counter check shall be forwarded to Accounting on a daily basis.

21.18 The original and all copies of the counter check shall include the following information:

- (A) person's name;
- (B) counter check number;
- (C) date and time of issuance; and
- (D) amount of the counter check.

**§ 22 Credit Payments**

22.01 All counter checks shall be due no later than 30 days from the date the credit was extended (313.817.9, RSMo). The Class B Licensee may extend credit for a period less than 30 days; in any event, the Class B Licensee shall withdraw the amount of credit from the patron's banking account on the date the credit is due (313.800.7, RSMo).

22.02 Payments on counter checks shall only be accepted at the cage or by mail. Business checks, other than DBA checks that include the name of the individual presenting the check, shall not be accepted as payments on counter checks.

22.03 The counter check payment slip shall include the same number as the original slip. When the counter check is paid in full or replaced due to in-person partial payment, it shall also include the date and time of payment, the manner of payment (e.g., cash, chips), amount of payment, and name of person making payment. The payment slip shall also include the signature of the cashier receiving the payment. If processed at a front line window, the payment slip shall be transferred to the main bank or floating employee window along with the additional funds at the time of payment.

22.04 If a counter check is settled prior to deposit, the original slip shall be stamped "paid" and returned to the person.

22.05 The Class B Licensee shall deposit all counter checks which are still in its possession 30 days from the date of issuance. If the 30th day falls on a non-banking day, the counter check shall be deposited the next banking day. For example, if a counter check is issued

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for the full 30-day period on the 1st day of the month, it must be deposited no later than the 31st day of the month.

- 22.06 Payments received at the cage shall be processed by a frontline window cashier or the cashier responsible for credit instrument accountability.
- 22.07 When a partial payment is made on a counter check at the cage, the cashier shall accept payment and issue a new counter check which shall be completed using the procedures established for issuing counter checks. The new counter check shall be issued using the original date, remaining balance, and a reference to the check number of the original counter check.
- 22.08 When a new counter check is issued to consolidate or replace existing counter check(s), the new counter check shall be completed using the oldest date of the counter check(s) being replaced, the remaining balance, and a reference to the check number(s) of the original counter check(s) (313.817.9, RSMo).
- 22.09 Payments by mail shall be received and logged as received by an employee whose job position is independent of credit instrument custody and collection.
- 22.10 A payment received by mail shall be—
- (A) recorded on a log indicating the following:
    - (1) person’s name;
    - (2) amount of payment;
    - (3) type of payment and check number or similar identifying number, if applicable;
    - (4) date payment received; and
    - (5) signature of employee receiving the payment; and
  - (B) processed as follows:
    - (1) A partial payment shall be placed in safekeeping until necessary funds accumulate to pay the counter check in its entirety. The safekeeping deposit receipt shall be mailed to the person. If the partial payment is in the form of a check, the check shall be deposited into the casino bank account by the next banking day (313.812.9, RSMo); or
    - (2) A full payment shall be transferred to the floating bank responsible for counter check accountability, as specified in the internal controls, and applied to the counter check(s). The counter check shall be stamped “paid” and mailed to the person.

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**§ 23 Credit Information and Privileges**

- 23.01 Access to credit information, including outstanding credit instruments and credit write-offs, shall be restricted to those positions which require access and are authorized by management.
- 23.02 The Class B Licensee shall include procedures in the internal controls for the suspension of credit privileges and procedures for reinstating a person's credit privileges.
- 23.03 The Class B Licensee shall include procedures in the internal controls for reinstating the person's credit privileges if a person's credit file has been inactive for a period of time as designated in the internal controls.

**§ 24 Credit Collection and Write-offs**

- 24.01 The internal controls shall describe the required procedures for collection of returned counter checks, settlement agreements, and the writing-off of credit instruments, including required forms.
- 24.02 Collection efforts for outstanding credit instruments and payment/settlement agreements shall be documented and maintained.
- 24.03 Records of all correspondence, transfers to and from outside agencies, and other documents related to credit instruments shall be maintained.
- 24.04 If outstanding credit instruments are transferred to outside offices, collection agencies or other collection representatives, a copy of the credit instrument and a receipt from the collection representative shall be obtained and maintained until such time as the credit instrument is returned or payment is received. A detailed listing shall be maintained to document all outstanding credit instruments which have been transferred to other offices. The listing shall be prepared or reviewed by an individual independent of credit transactions and collections.
- 24.05 Written-off or settled/discounted credit instrument approvals shall be made by at least two managers as identified in the internal controls, at least one of whom is independent of the initial credit limit approval process, and the issuance and collection of credit relative to the person's credit account. The individuals approving the write-off or settlement/discount shall sign a document, identified in the internal controls, indicating authorization.

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- 24.06 A listing of all casino accounts receivable, including the name of the person and current balance, shall be prepared at least monthly for active (collection still feasible), inactive (collection efforts terminated), settled/discounted, or written-off accounts.

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