

Oneida Tribe of Indians of Wisconsin

BUSINESS COMMITTEE



Oneidas bringing several hundred bags of corn to Washington's starving army at Valley Forge, after the colonists had consistently refused to aid them.



UGWA DEMOLUM YATEHE
Because of the help of this Oneida Chief in cementing a friendship between the six nations and the colony of Pennsylvania, a new nation, the United States was made possible.

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BC Resolution # 2-01-06-A

Resolution Adopting Oneida Gaming Minimum Internal Control Regulations Amendments

- WHEREAS, the Oneida Tribe of Indians of Wisconsin is a federally recognized Indian government and a treaty tribe recognized by the laws of the United States, and
- WHEREAS, the Oneida General Tribal Council is the governing body of the Oneida Tribe of Indians of Wisconsin, and
- WHEREAS, the Oneida Business Committee has been delegated the authority of Article IV, Section 1 of the Oneida Tribal Constitution by the Oneida General Tribal Council, and
- WHEREAS, the Oneida Business Committee may be delegated duties and responsibilities by the Oneida General Tribal Council and is at all times subject to the review powers of the Oneida General Tribal Council, and
- WHEREAS, the Tribe has entered into the Second Amendment to the Gaming Compact by which the Tribe is authorized to operate additional Class III gaming, and
- WHEREAS, the Second Amendment to the Gaming Compact requires the Tribe to implement Minimum Internal Controls for all games at least as stringent as the federal regulations promulgated by the National Indian Gaming Commission and submit such regulations to the State of Wisconsin, and
- WHEREAS, the Oneida Business Committee approved the Oneida Gaming Minimum Internal Control Regulations through passage of BC #7-02-03-E, amended BC #4-28-04-A and BC#6-01-05-A, and

WHEREAS, the National Indian Gaming Commission published amendments to the Code of Federal Regulations that recommend certain changes to Tribal minimum internal control regulations, and

WHEREAS, statements concerning the internal management of an area are exempt from the Administrative Procedures Act (APA) requirements for adoption of rules/regulations.

NOW THEREFORE BE IT RESOLVED, that the Oneida Business Committee hereby adopts the following amendments to the Oneida Gaming Minimum Internal Control Regulations.

3-42 shall be deleted in its entirety and replaced with the following:

"Complimentary" means a service or item provided at no cost, or at a reduced cost, to a customer.

3-65 shall be deleted in its entirety and replaced with the following:

"Drop period" means the period of time between the sequential removal of drop buckets, currency acceptor boxes and drop boxes from the gaming machines and table games.

3-82 shall be deleted in its entirety and replaced with the following:

"Gaming machine" means an electronic or electro mechanical machine which allows a player to play games of chance, some of which may be affected by skill, that contains a microprocessor with a random number generator capacity for outcome selection or computer terminal that accesses an outcome that is subsequently and randomly selected in drawings that are electronically conducted by a central computer or other such methods of chance selection, whether mechanical or electronic. The machine is activated by the insertion of cash or cash equivalents and which awards cash, cash equivalents, merchandise, replays, or a written statement of the player's accumulated credits, which written statements may be redeemable for cash.

3-144 shall be deleted in its entirety and replaced with the following:

"Promotional progressive pots and/or pools" means funds contributed to a table game or card game by and for the benefit of players. Funds are distributed to players based on a predetermined event.

5-2(e) shall be deleted in its entirety and replaced with the following:

Gaming machines will be examined by appropriate Gaming personnel if the jackpot exceeds \$50,000, or for lower payouts if otherwise deemed necessary based upon the judgment of the Tribe, or Tribal Gaming Management as approved by the Tribe. This examination verifies that the PSMs are correct and the jackpot is valid.

5-4(a) shall be deleted in its entirety and replaced with the following:

All gaming machine booths and change banks are maintained on an imprest basis and shall be counted down after each shift they are in use, by both the outgoing and oncoming booth employees, supervisory personnel or gaming machine floorperson, who sign the gaming machine booth checkout sheet attesting to the accuracy of the count. If the gaming machine booth is short or over, it is corrected by a cash variation slip signed by the

out-going gaming machine booth employee, and authorized by the gaming machine supervisor. Unverified transfers of cash and/or cash equivalents are prohibited.

5-8(e) shall be deleted in its entirety and replaced with the following:

For multi-game or multi-denominational machines, an employee or department independent of the gaming machine department shall:

1. Weekly, record the total coin-in meter;
2. Quarterly, record the coin-in meters for each game contained in the machine; and
3. On an annual basis, adjust the theoretical hold percentage in the gaming machine statistical report to a weighted average based upon the ratio of coin-in for each game payable.

5-8(f) shall be deleted in its entirety and replaced with the following:

For machines that are multi-game and multi-denominational, an employee or department independent of the gaming machine department shall:

1. Weekly, record the total coin-in meter;
2. Quarterly, record the coin-in meters for each game contained in the machine; and
3. On an annual basis, adjust the theoretical hold percentage in the gaming machine statistical report to a weighted average based upon the ratio of coin-in for each game.
4. For machines that are multi-game and multi-denominational, theoretical hold percentage can be calculated by a simple weighted average of the various denominational theoretical hold percentages contained within each game, then using that average theoretical hold percentage in the weighted average calculation based on patron game selection. To make additional reductions in the number of calculations, games with similar theoretical hold percentages (those who a difference of less than 0.5 percentage points) may be grouped.

5-8(q) shall be deleted in its entirety and replaced with the following:

For those machines that have experienced at least 100,000 wagering transactions year-to-date, large variances (3%) between theoretical hold and actual hold shall be investigated and resolved by a department independent of the gaming machine department with the findings documented and provided to the Tribe or its authorized personnel upon request in a timely manner.

5-8(t) shall be deleted in its entirety and replaced with the following:

The adjusted theoretical hold percentage for multi-game and/or multi-denominational machines may be combined for machines with exactly the same game mix throughout the year.

5-9(d) shall be deleted in its entirety and replaced with the following:

For each drop period, accounting/auditing employees shall compare the bill-in meter reading to the total bill acceptor drop amount for the period. Discrepancies shall be resolved prior to the generation/distribution of gaming machine statistical reports.

5-29(b) shall be deleted in its entirety and replaced with the following:

All funds used to operate the bingo gaming shall be counted independently by at least two persons and reconciled to the recorded amounts at the end of each shift or session. Unverified transfers of cash and/or cash equivalents are prohibited.

5-31(b) shall be deleted in its entirety and replaced with the following:

All funds used to operate the pull tab game shall be counted independently by at least two persons and reconciled to the recorded amounts at the end of each shift or session. Unverified transfers of cash and/or cash equivalents are prohibited.

5-37(f)(1)(B) shall be deleted in its entirety and replaced with the following:

Signatures of two employees who have verified the net cash proceeds for the shift and the cash turned in. Unverified transfers of cash and/or cash equivalents are prohibited.

5-38(h)(5)(B)(ii) shall be deleted in its entirety and replaced with the following:

Signatures of two employees who have verified the cash turned in for the shift. Unverified transfers of cash and/or cash equivalents are prohibited.

5-41(b) shall be deleted in its entirety and replaced with the following:

The Gaming Operation shall establish a minimum bankroll formula to ensure the Gaming Operation maintains cash or cash equivalents (on hand and in the bank, if readily accessible) in an amount sufficient to satisfy obligations to the Gaming Operation's customers as they are incurred.

5-41(c) shall be deleted in its entirety and replaced with the following:

The cage and vault (including coin room) inventories shall be counted by the oncoming and outgoing cashiers. These employees shall make individual counts for comparison of accuracy and maintenance of individual accountability. Such counts shall be recorded at the end of each shift during which activity took place. All discrepancies shall be noted and investigated. Unverified transfers of cash and/or cash equivalents are prohibited.

5-46 shall be deleted in its entirety and replaced with the following:

Document Requirements. The following documentation shall be available to all departments in a Gaming Operation, which may encounter reportable transactions:

- a. Currency Transaction Reports (CTRs) - FinCen Form 103 (formerly Form 8362);
- b. Suspicious Activity Reports (SARs) - FinCen Form 102;
- c. Title 31 Internal Controls; and
- d. Supporting documentation to include, but not limited to, Daily Action Control Logs (formerly Multiple Transaction Logs or "MTLs").

5-47 shall be deleted in its entirety and replaced with the following:

Daily Action Control Logs (DACLs). A Daily Action Control Log (DACL) is a log maintained in each monitoring area for purposes of recording information relative to cash transactions.

- a. Only one DACL shall be used at a time, per monitoring area, for each designated 24 hour period (i.e., gaming day).
- b. Transactions involving cash in the amount of \$3,000 or more shall be recorded on a DACL. In addition, subsequent cash transactions relative to a recorded customer shall also be recorded for aggregation purposes.

Cash-in and cash-out transactions for each customer shall be totaled separately. Also, transactions shall be logged after each occurrence. In addition, once the monitoring process has been initiated for a customer, the

information shall be communicated as relevant to personnel and other departments which may be involved in the process (i.e., Surveillance, Security, and other gaming departments).

c. A DACL shall contain the following information for each logged transaction:

1. Description of the customer which shall include, but is not limited to, age, sex, race, eye color, hair, weight, height, and attire;
2. Customer's name, if known;
3. Table number, station number, window number, or other identification of the location where the transaction occurred;
4. Time and date when the transaction occurred;
5. Type of transaction (i.e. Cash in or cash out, safekeeping, chip redemption, etc.);
6. Dollar amount of the transaction; and
7. Signature and employee number of the person recording each transaction.

Note: In the event a customer is using an agent during game play or for cash exchange purposes, each person is logged separately on the DACL and an indication is made to illustrate the two customer amounts must be accrued combined.

d. DACLs shall be reviewed by the oncoming supervisory personnel at the beginning of their shift and continually monitored for possible reporting requirements.

e. If within a 24 hour period, a monitored customer attempts to complete a transaction which when combined with previously recorded cash-in or cash-out transactions, exceeds the \$10,000 threshold, a Currency Transaction Report (FinCen Form 103) shall be completed. Reporting shall occur when the accumulated amount exceeds the threshold for cash-in or cash-out transactions respectively.

f. Completed logs shall be signed by the responsible supervisory personnel for each shift of the gaming day attesting to their proper completion.

g. Responsible employees shall engage due diligence to ensure the proper reporting of multiple cash transactions and record keeping requirements.

h. A DACL shall be completed and appropriately signed for each gaming day for each monitoring area regardless of whether or not any reportable transactions have occurred.

i. If there are no reportable transactions recorded for the entire shift or other period of supervision, the monitoring supervisor shall clearly indicate that "no activity" has occurred and sign the DACL attesting to the accuracy and completeness of the DACL.

j. At the conclusion of the designated 24 hour period, a new DACL shall be initiated.

k. All completed DACLs shall be promptly forwarded to the Accounting Department, retained in chronological order and maintained for inspection for seven (7) years.

The title of 5-48 shall be amended as follows: deleted in its entirety and replaced with the following:

Currency Transaction Reports (CTR - CinFen Form 103).

5-53(a) shall be deleted in its entirety and replaced with the following:

The Accounting Department shall develop and implement procedures to assure Title 31 compliance and proper record keeping which include:

1. Ensuring prohibited transactions do not occur;
2. Properly recording, reporting, and processing all transactions that fall under the criteria of Title 31;
3. Making a diligent effort to prevent the circumvention of Title 31 or the reporting and record keeping requirements thereof by multiple transactions in a designated 24 hour period;
4. Being knowledgeable of, and appropriately updated on Title 31 regulations, suspicious transactions and record keeping requirements;
5. Receiving CTRs, SARs, DACLs and any supporting documentation from the various departments or monitoring areas in accordance with established deadlines;
6. Inspecting all documents for Title 31 compliance. DACLs shall be reviewed to ensure CTRs were completed for reportable transactions;

7. Verifying all exceptions discovered through the accounting review are documented and forwarded to the appropriate personnel;
8. Signing reports attesting to the review and remit CTRs and SARs in accordance with Title 31; and
9. Filing a copy of each CTR and SAR and the original DACL and any related documentation including any relevant Title 31 information or records in chronological order and such documents shall be readily available for examination by appropriate personnel.

5-55(e)(3) shall be deleted in its entirety and replaced with the following:

Reviewing the proper use and completion of a CTR, SAR, and DACL;

6-18(a) shall be deleted in its entirety and replaced with the following:

When Tribal Gaming Management permanently removes from use or replaces chips or tokens, or ceases operating a Gaming Facility or closes its Gaming Operation, Tribal Gaming Management must redeem discontinued chips and tokens that remain outstanding by giving public notice at each Gaming Facility of the date on which use of the chips or tokens will be discontinued and the date by which the discontinued tokens or chips must be redeemed.

10-4(d) shall be deleted in its entirety and replaced with the following:

The table game drop boxes shall be individually emptied and counted in such a manner to prevent the commingling of funds between boxes until the count of the box has been recorded.

1. The count of each box shall be recorded in ink or other permanent form of recordation.
2. Corrections to information originally recorded by the count team on soft count documentation shall be made by drawing a single line through the error, writing the correct figure above the original figure, and then obtaining the initials of at least two count team members who verified the change, unless the count team only has two (2) members in which case the initials of only one (1) verifying member is required.

10-6(d) shall be deleted in its entirety and replaced with the following:

The bill acceptor canisters shall be individually emptied and counted in such a manner to prevent the commingling of funds between canisters until the count of the canister has been recorded.

1. The count of each canister shall be recorded in ink or other permanent form of recordation.
2. Corrections to information originally recorded by the count team on soft count documentation shall be made by drawing a single line through the error, writing the correct figure above the original figure, and then obtaining the initials of at least two count team members who verified the change.

10-6(l) shall be deleted in its entirety.

10-9(c)(1) shall be deleted in its entirety and replaced with the following:

The Gaming Operation shall utilize and maintain an effective on-line gaming machine monitoring system, as described in 5-9(b);

Article X shall be amended and re-numbered to add the following:

10-20. *Gaming Machine Computerized Key Security Systems.*

- a. Computerized key security systems which restrict access to the gaming machine drop and count keys through

the use of passwords, keys or other means, other than a key custodian, must provide the same degree of control as indicated in the aforementioned key control standards; refer to 10-12, 10-15, 10-17 and 10-19. Note: This standard does not apply to the system administrator. The system administrator is defined in 10-20(b)(i).

b. For computerized key security systems, the following additional gaming machine key control procedures apply:

i. Management personnel, independent of the gaming machine department, shall assign and control user access to keys in the computerized key security system (i.e., system administrator) to ensure that gaming machine drop and count keys are restricted to authorized employees.

ii. In the event of an emergency or the key box is inoperable, access to the emergency manual key(s) (a.k.a. override key), used to access the box containing the gaming machine drop and count keys, requires the physical involvement of at least three persons from separate departments, including management. The date, time, and reason for access, must be documented with the signatures of all participating employees signing out/in the emergency manual key(s).

iii. The custody of the keys issued pursuant to 10-20(b)(ii) requires the presence of two persons from separate departments from the time of their issuance until the time of their return.

iv. Routine physical maintenance that requires accessing the emergency manual key(s) (override key) and does not involve the accessing of the gaming machine drop and count keys, only requires the presence of two persons from separate departments. The date, time and reason for access must be documented with the signatures of all participating employees signing out/in the emergency manual key(s).

c. For computerized key security systems controlling access to gaming machine drop and count keys, accounting/audit personnel, independent of the system administrator, will perform the following procedures:

i. Daily, review the report generated by the computerized key security system indicating the transactions performed by the individual(s) that adds, deletes, and changes user's access within the system (i.e., system administrator). Determine whether the transactions completed by the system administrator provide an adequate control over the access to the gaming machine drop and count keys. Also, determine whether any gaming machine drop and count key(s) removed or returned to the key cabinet by the system administrator was properly authorized.

ii. For at least one day each month, review the report generated by the computerized key security system indicating all transactions performed to determine whether any unusual gaming machine drop and count key removals or key returns occurred.

iii. At least quarterly, review a sample of users that are assigned access to the gaming machine drop and count keys to determine that their access to the assigned keys is adequate relative to their job position.

iv. All noted improper transactions or unusual occurrences are investigated with the results documented.

d. Quarterly, an inventory of all count room, drop box release, storage rack and contents keys is performed, and reconciled to records of keys made, issued, and destroyed. Investigations are performed for all keys unaccounted for, with the investigation being documented.

10-21. *Table Games Computerized Key Security Systems.*

a. Computerized key security systems which restrict access to the table game drop and count keys through the use of passwords, keys or other means, other than a key custodian, must provide the same degree of control as indicated in the aforementioned key control standards; refer to 10-13, 10-14, 10-16 and 10-18. Note: This standard does not apply to the system administrator. The system administrator is defined in 10-21(b)(i).

b. For computerized key security systems, the following additional table game key control procedures apply:

i. Management personnel, independent of the table game department, shall assign and control user access to keys in the computerized key security system (i.e., system administrator) to ensure that table game drop and count keys are restricted to authorized employees.

ii. In the event of an emergency or the key box is inoperable, access to the emergency manual key(s) (a.k.a. override key), used to access the box containing the table game drop and count keys, requires the physical involvement of at least three persons from separate departments, including management.

The date, time, and reason for access, must be documented with the signatures of all participating employees signing out/in the emergency manual key(s).

iii. The custody of the keys issued pursuant to 10-21(b)(ii) requires the presence of two persons from separate departments from the time of their issuance until the time of their return.

iv. Routine physical maintenance that requires accessing the emergency manual key(s) (override key) and does not involve the accessing of the table games drop and count keys, only requires the presence of two persons from separate departments. The date, time and reason for access must be documented with the signatures of all participating employees signing out/in the emergency manual key(s).

c. For computerized key security systems controlling access to table games drop and count keys, accounting/audit personnel, independent of the system administrator, will perform the following procedures:

i. Daily, review the report generated by the computerized key security system indicating the transactions performed by the individual(s) that adds, deletes, and changes user's access within the system (i.e., system administrator). Determine whether the transactions completed by the system administrator provide an adequate control over the access to the table games drop and count keys. Also, determine whether any table games drop and count key(s) removed or returned to the key cabinet by the system administrator was properly authorized.

ii. For at least one day each month, review the report generated by the computerized key security system indicating all transactions performed to determine whether any unusual table games drop and count key removals or key returns occurred.

iii. At least quarterly, review a sample of users that are assigned access to the table games drop and count keys to determine that their access to the assigned keys is adequate relative to their job position.

iv. All noted improper transactions or unusual occurrences are investigated with the results documented.

d. Quarterly, an inventory of all count room, table game drop box release, storage rack and contents keys is performed, and reconciled to records of keys made, issued, and destroyed. Investigations are performed for all keys unaccounted for, with the investigations being documented.

10-30(a)(1)(B) shall be deleted in its entirety and replaced with the following:

Examination of available Title 31 documentation including CTRs, SARs, and DACLs:

10-30(b)(1) shall be deleted in its entirety and replaced with the following:

Examinations of Title 31 documentation including CTRs, SARs, and DACLs with testing done on a quarterly basis which includes samples; and

10-40(g) shall be deleted in its entirety and replaced with the following:

Wide-area Progressive Machine. Wide area progressive machines offering a base payout amount of more than \$1 million and monitored by an independent vendor utilizing an on-line progressive computer system shall be recorded by a dedicated camera(s) to provide coverage of:

1. All customers and employees at the gaming machine; and
2. The face of the gaming machine, with sufficient clarity to identify the payout line(s) of the gaming machine.

11-4(d) shall be deleted in its entirety and replaced with the following:

The table game drop boxes shall be individually emptied and counted in such a manner to prevent the commingling of funds between boxes until the count of the box has been recorded.

1. The count of each box shall be recorded in ink or other permanent form of recordation.
2. Corrections to information originally recorded by the count team on soft count documentation shall

- be made by drawing a single line through the error, writing the correct figure above the original figure, and then obtaining the initials of at least two count team members who verified the change, unless the count team has only two (2) members, in which case the initials of only one (1) verifying count team member is required.

11-6(d) shall be deleted in its entirety and replaced with the following:

The bill acceptor canisters shall be individually emptied and counted in such a manner to prevent the commingling of funds between canisters until the count of the canister has been recorded.

1. The count of each canister shall be recorded in ink or other permanent form of recordation.
2. Corrections to information originally recorded by the count team on soft count documentation shall be made by drawing a single line through the error, writing the correct figure above the original figure, and then obtaining the initials of at least two count team members who verified the change.

11-6(l) shall be deleted in its entirety.

11-9(c)(1) shall be deleted in its entirety and replaced with the following:

The Gaming Operation shall utilize and maintain an effective on-line gaming machine monitoring system, as described in provision 5-9(b).

Article XI shall be amended and re-numbered to add the following:

11-20. *Gaming Machine Computerized Key Security Systems.*

- a. Computerized key security systems which restrict access to the gaming machine drop and count keys through the use of passwords, keys or other means, other than a key custodian, must provide the same degree of control as indicated in the aforementioned key control standards; refer to 11-12, 11-15, 11-17, and 11-19. Note: This standard does not apply to the system administrator. The system administrator is defined in 11-20(b)(i).
- b. For computerized key security systems, the following additional gaming machine key control procedures apply:
 - i. Management personnel, independent of the gaming machine department, shall assign and control user access to keys in the computerized key security system (i.e., system administrator) to ensure that gaming machine drop and count keys are restricted to authorized employees.
 - ii. In the event of an emergency or the key box is inoperable, access to the emergency manual key(s) (a.k.a. override key), used to access the box containing the gaming machine drop and count keys, requires the physical involvement of at least three persons from separate departments, including management. The date, time, and reason for access, must be documented with the signatures of all participating employees signing out/in the emergency manual key(s).
 - iii. The custody of the keys issued pursuant to 11-20(b)(ii) requires the presence of two persons from separate departments from the time of their issuance until the time of their return.
 - iv. Routine physical maintenance that requires accessing the emergency manual key(s) (override key) and does not involve the accessing of the gaming machine drop and count keys, only requires the presence of two persons from separate departments. The date, time and reason for access must be documented with the signatures of all participating employees signing out/in the emergency manual key(s).
- c. For computerized key security systems controlling access to gaming machine drop and count keys, accounting/audit personnel, independent of the system administrator, will perform the following procedures:
 - i. Daily, review the report generated by the computerized key security system indicating the transactions performed by the individual(s) that adds, deletes, and changes user's access within the system (i.e., system administrator). Determine whether the transactions completed by the system

- administrator provide an adequate control over the access to the gaming machine drop and count keys. Also, determine whether any gaming machine drop and count key(s) removed or returned to the key cabinet by the system administrator was properly authorized.
- ii. For at least one day each month, review the report generated by the computerized key security system indicating all transactions performed to determine whether any unusual gaming machine drop and count key removals or key returns occurred.
 - iii. At least quarterly, review a sample of users that are assigned access to the gaming machine drop and count keys to determine that their access to the assigned keys is adequate relative to their job position.
 - iv. All noted improper transactions or unusual occurrences are investigated with the results documented.
- d. Quarterly, an inventory of all count room, drop box release, storage rack and contents keys is performed, and reconciled to records of keys made, issued, and destroyed. Investigations are performed for all keys unaccounted for, with the investigation being documented.

11-21. *Table Games Computerized Key Security Systems.*

- a. Computerized key security systems which restrict access to the table game drop and count keys through the use of passwords, keys or other means, other than a key custodian, must provide the same degree of control as indicated in the aforementioned key control standards, refer to 11-13, 11-14, 11-16, and 11-18. Note: This standard does not apply to the system administrator. The system administrator is defined in 11-21(b)(i).
- b. For computerized key security systems, the following additional table game key control procedures apply:
 - i. Management personnel, independent of the table game department, shall assign and control user access to keys in the computerized key security system (i.e., system administrator) to ensure that table game drop and count keys are restricted to authorized employees.
 - ii. In the event of an emergency or the key box is inoperable, access to the emergency manual key(s) (a.k.a. override key), used to access the box containing the table game drop and count keys, requires the physical involvement of at least three persons from separate departments, including management. The date, time, and reason for access, must be documented with the signatures of all participating employees signing out/in the emergency manual key(s).
 - iii. The custody of the keys issued pursuant to 11-21(b)(ii) requires the presence of two persons from separate departments from the time of their issuance until the time of their return.
 - iv. Routine physical maintenance that requires accessing the emergency manual key(s) (override key) and does not involve the accessing of the table games drop and count keys, only requires the presence of two persons from separate departments. The date, time and reason for access must be documented with the signatures of all participating employees signing out/in the emergency manual key(s).
- c. For computerized key security systems controlling access to table games drop and count keys, accounting/audit personnel, independent of the system administrator, will perform the following procedures:
 - i. Daily, review the report generated by the computerized key security system indicating the transactions performed by the individual(s) that adds, deletes, and changes user's access within the system (i.e., system administrator). Determine whether the transactions completed by the system administrator provide an adequate control over the access to the table games drop and count keys. Also, determine whether any table games drop and count key(s) removed or returned to the key cabinet by the system administrator was properly authorized.
 - ii. For at least one day each month, review the report generated by the computerized key security system indicating all transactions performed to determine whether any unusual table games drop and count key removals or key returns occurred.
 - iii. At least quarterly, review a sample of users that are assigned access to the table games drop and count keys to determine that their access to the assigned keys is adequate relative to their job position.
 - iv. All noted improper transactions or unusual occurrences are investigated with the results documented.
- d. Quarterly, an inventory of all count room, table game drop box release, storage rack and contents keys is performed, and reconciled to records of keys made, issued, and destroyed. Investigations are performed for all

keys unaccounted for, with the investigations being documented.

11-30(a)(1)(B) shall be deleted in its entirety and replaced with the following:

Examination of available Title 31 documentation including CTRs, SARs, and DACLs;

11-30(b)(1) shall be deleted in its entirety and replaced with the following:

Examinations of Title 31 documentation including CTRs, SARs, and DACLs with testing done on a quarterly basis which includes samples;

11-42(g) shall be deleted in its entirety and replaced with the following:

Wide-area Progressive Machine. Wide area progressive machines offering a base payout amount of more than \$1 million and monitored by an independent vendor utilizing an on-line progressive computer system shall be monitored and recorded by a dedicated camera(s) to provide coverage of:

1. All customers and employees at the gaming machine; and
2. The face of the gaming machine, with sufficient clarity to identify the payout line(s) of the gaming machine.

12-4(d) shall be deleted in its entirety and replaced with the following:

The table game drop boxes shall be individually emptied and counted in such a manner to prevent the commingling of funds between boxes until the count of the box has been recorded.

1. The count of each box shall be recorded in ink or other permanent form of recordation.
2. Corrections to information originally recorded by the count team on soft count documentation shall be made by drawing a single line through the error, writing the correct figure above the original figure, and then obtaining the initials of at least two count team members who verified the change.

12-6(d) shall be deleted in its entirety and replaced with the following:

The bill acceptor canisters shall be individually emptied and counted in such a manner to prevent the commingling of funds between canisters until the count of the canister has been recorded.

1. The count of each canister shall be recorded in ink or other permanent form of recordation.
2. Corrections to information originally recorded by the count team on soft count documentation shall be made by drawing a single line through the error, writing the correct figure above the original figure, and then obtaining the initials of at least two count team members who verified the change.

12-6(l) shall be deleted in its entirety.

12-9(c)(1) shall be deleted in its entirety and replaced with the following:

The Gaming Operation shall utilize and maintain an effective on-line gaming machine monitoring system, as described in provision 5-9(b).

Article XII shall be amended and re-numbered to add the following:

12-20. *Gaming Machine Computerized Key Security Systems.*

- a. Computerized key security systems which restrict access to the gaming machine drop and count keys through the use of passwords, keys or other means, other than a key custodian, must provide the same degree of control as indicated in the aforementioned key control standards; refer to 12-12, 12-15, 12-17 and 12-19. Note: This standard does not apply to the system administrator. The system administrator is defined in 12-20(b)(i).
- b. For computerized key security systems, the following additional gaming machine key control procedures apply:
 - i. Management personnel, independent of the gaming machine department, shall assign and control user access to keys in the computerized key security system (i.e., system administrator) to ensure that gaming machine drop and count keys are restricted to authorized employees.
 - ii. In the event of an emergency or the key box is inoperable, access to the emergency manual key(s) (a.k.a. override key), used to access the box containing the gaming machine drop and count keys, requires the physical involvement of at least three persons from separate departments, including management. The date, time, and reason for access, must be documented with the signatures of all participating employees signing out/in the emergency manual key(s).
 - iii. The custody of the keys issued pursuant to 12-20(b)(ii) requires the presence of two persons from separate departments from the time of their issuance until the time of their return.
 - iv. Routine physical maintenance that requires accessing the emergency manual key(s) (override key) and does not involve the accessing of the gaming machine drop and count keys, only requires the presence of two persons from separate departments. The date, time and reason for access must be documented with the signatures of all participating employees signing out/in the emergency manual key(s).
- c. For computerized key security systems controlling access to gaming machine drop and count keys, accounting/audit personnel, independent of the system administrator, will perform the following procedures:
 - i. Daily, review the report generated by the computerized key security system indicating the transactions performed by the individual(s) that adds, deletes, and changes user's access within the system (i.e., system administrator). Determine whether the transactions completed by the system administrator provide an adequate control over the access to the gaming machine drop and count keys. Also, determine whether any gaming machine drop and count key(s) removed or returned to the key cabinet by the system administrator was properly authorized.
 - ii. For at least one day each month, review the report generated by the computerized key security system indicating all transactions performed to determine whether any unusual gaming machine drop and count key removals or key returns occurred.
 - iii. At least quarterly, review a sample of users that are assigned access to the gaming machine drop and count keys to determine that their access to the assigned keys is adequate relative to their job position.
 - iv. All noted improper transactions or unusual occurrences are investigated with the results documented.
- d. Quarterly, an inventory of all count room, drop box release, storage rack and contents keys is performed, and reconciled to records of keys made, issued, and destroyed. Investigations are performed for all keys unaccounted for, with the investigation being documented.

12-21. *Table Games Computerized Key Security Systems.*

- a. Computerized key security systems which restrict access to the table game drop and count keys through the use of passwords, keys or other means, other than a key custodian, must provide the same degree of control as indicated in the aforementioned key control standards; refer to 12-13, 12-14, 12-16 and 12-18. Note: This standard does not apply to the system administrator. The system administrator is defined in 12-21(b)(i).
- b. For computerized key security systems, the following additional table game key control procedures apply:
 - i. Management personnel, independent of the table game department, shall assign and control user access to keys in the computerized key security system (i.e., system administrator) to ensure that table game drop and count keys are restricted to authorized employees.
 - ii. In the event of an emergency or the key box is inoperable, access to the emergency manual key(s) (a.k.a. override key), used to access the box containing the table game drop and count keys, requires

the physical involvement of at least three persons from separate departments, including management. The date, time, and reason for access, must be documented with the signatures of all participating employees signing out/in the emergency manual key(s).

iii. The custody of the keys issued pursuant to 12-21(b)(ii) requires the presence of two persons from separate departments from the time of their issuance until the time of their return.

iv. Routine physical maintenance that requires accessing the emergency manual key(s) override key) and does not involve the accessing of the table games drop and count keys, only requires the presence of two persons from separate departments. The date, time and reason for access must be documented with the signatures of all participating employees signing out/in the emergency manual key(s).

c. For computerized key security systems controlling access to table games drop and count keys, accounting/audit personnel, independent of the system administrator, will perform the following procedures:

i. Daily, review the report generated by the computerized key security system indicating the transactions performed by the individual(s) that adds, deletes, and changes user's access within the system (i.e., system administrator). Determine whether the transactions completed by the system administrator provide an adequate control over the access to the table games drop and count keys. Also, determine whether any table games drop and count key(s) removed or returned to the key cabinet by the system administrator was properly authorized.

ii. For at least one day each month, review the report generated by the computerized key security system indicating all transactions performed to determine whether any unusual table games drop and count key removals or key returns occurred.

iii. At least quarterly, review a sample of users that are assigned access to the table games drop and count keys to determine that their access to the assigned keys is adequate relative to their job position.

(iv) All noted improper transactions or unusual occurrences are investigated with the results documented.

d. Quarterly, an inventory of all count room, table game drop box release, storage rack and contents keys is performed, and reconciled to records of keys made, issued, and destroyed. Investigations are performed for all keys unaccounted for, with the investigations being documented.

12-30(a)(1)(B) shall be deleted in its entirety and replaced with the following:

Examination of available Title 31 documentation including CTRs, SARs, and DACLs;

12-30(b)(1) shall be deleted in its entirety and replaced with the following:

Examinations of Title 31 documentation including CTRs, SARs, and DACLs with testing done on a quarterly basis which includes samples;

12-42(g) shall be deleted in its entirety and replaced with the following:

Wide-area Progressive Machine. Wide area progressive machines offering a base payout amount of more than \$1 million and monitored by an independent vendor utilizing an on-line progressive computer system shall be monitored and recorded by a dedicated camera(s) to provide coverage of:

1. All customers and employees at the gaming machine; and
2. The face of the gaming machine, with sufficient clarity to identify the payout line(s) of the gaming machine.

CERTIFICATION

I, the undersigned, as Secretary of the Oneida Business Committee, hereby certify that the Oneida Business Committee is composed of 9 members of whom 5 members constitute a quorum. 5 members were present at a meeting duly called, noticed and held on the 1st day of February, 2006, that the foregoing resolution was duly adopted at such meeting by a vote of 4 members for; 0 members against, and 0 members not voting; and that said resolution has not be rescinded or amended in any way,



Patricia Hoeft, Tribal Secretary
Oneida Business Committee