

Colorado Limited Gaming Control Commission
Internal Control Minimum Procedures (ICMP)

SECTION 3

PLAYER BANKED POKER

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

A. GENERAL

Poker Room

Licenses must have a minimum of one shift for each twenty-four hour period, but may elect to have more than one shift per gaming day. Required gaming documents must be maintained for each shift.

Only items necessary for the operation of the pit are allowed in the pit. Currency in wallets or money clips is allowed in the pit so long as it is kept in the person's pocket.

If a poker room maintains its own imprest bank, procedures must be in place to ensure the protection of the assets. A poker bank exchange form is used when the poker room imprest bank needs to purchase chips from the cashier cage. If table tray banks are maintained in the poker room, the table tray inventory must be carried as part of the pit imprest bank inventory.

Lammers must be kept in a secure place accessible only to the persons who supervise the dealers.

If a drop box automatically locks itself during the course of play, the drop box shall be removed from the table by security. Play of the game must be suspended while the box is removed for repair. The drop box must be opened and reset in the pit, under surveillance, and under the supervision of the gaming manager, security, and the pit supervisor. After the drop box has been repaired and reset, the box is attached to the table and play may resume.

If the drop box cannot be repaired in the pit it may be exchanged with an empty drop box. The drop box is taken to and secured in the count room by security and another licensed employee. They obtain an empty drop box and return to the pit. The empty drop box is placed on the table and a note indicating the problem, the previous drop box designation and shift must be prepared and dropped in the replacement drop box so that the contents may be combined and attributed to the individual table during the count. After the empty drop box has been attached to the table, play may resume.

If the drop box cannot be repaired or replaced due to mechanical difficulties, the table must be closed until the drop box is repaired or a working (usable) empty drop box is available.

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Poker Room Supervision

Adequate supervision of the table games pit/poker room must be maintained at all times. Adequate supervision means having one or more licensed employees who are knowledgeable in the games supervised and the regulatory requirements of such games, and are able to adequately monitor the play on all tables.

Licensees offering table games must have a pit supervisor in the pit at all times when tables are open for play.

Licensees offering table games must submit to the Division's Table Games Committee Chair a written pit supervision plan which details how adequate supervision is going to be achieved. Written approval must be received from the Division prior to offering any table games for play. A copy of the approved plan must be maintained in the pit area.

At no time may a dealer relieve a pit supervisor unless that dealer assumes the duties of the pit supervisor for the remainder of the shift. When a dealer relieves a pit supervisor, that dealer is automatically ineligible to participate in the distribution of tips for the remainder of the shift.

A pit supervisor may relieve a dealer temporarily for emergency purposes only (not to exceed 10 minutes). A scheduled relief dealer must be used for regular "break" periods. A pit supervisor, while temporarily relieving a dealer for emergency purposes, may accept tips on behalf of the regularly scheduled dealer. These tips must be immediately deposited in a locked box reserved for that purpose.

The pit supervisor, if not permanently relieved by a dealer, must be relieved by another pit supervisor, a shift manager or other licensed employee knowledgeable of the games being played.

Proposition Players

A proposition player ("Prop" or "House Player") is only allowed to play in a game when he/she is told where to play by the pit supervisor. A proposition player will not decide when and where he/she will play in a game. This could be considered a violation of CRS 12-47.1-814(2).

When a proposition player is also a licensed dealer, there may be only one switch during a shift. A dealer who has been working as a dealer, and is then used as a proposition player, will not be allowed to resume dealing duties for the remainder of the shift. A proposition player who has been working as a proposition player and then works as a dealer, will not be allowed to resume duties of a proposition player during the remainder of the shift.

All licensees employed as a proposition player will follow regulations set forth in CLGR 47.1-1048.

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Automated Pit Systems

Licensees are required to notify the Division, in writing, upon intent to use an automated pit system. See System Upgrades & Modifications in the Slot Monitoring Systems section for minimum information required in this notification. This notice is submitted a minimum of 30 days prior to the anticipated installation.

Prior to relying on a pit system, the licensee must test the system to ensure the system is properly communicating and functioning correctly. Testing of the system includes the following:

- Running the system parallel to the manual process for three consecutive days, and
- Reconciling the system generated forms to the manually generated forms for accuracy.

Once the licensee verifies the system generated forms accurately reconcile, in detail and in total, to the manually generated forms for three consecutive days, the licensee may rely on the pit system. Documentation of the parallel testing is subject to the document retention requirements mandated in CLGR 47.1-1607.

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

If the pit system goes down, the licensee reverts back to the manual process.

B. JACKPOT AWARD PROCEDURES

General

If one table is to be used in a single shift for two or more dissimilar poker games that offer jackpot awards, the jackpot award drop box must be removed, secured, and replaced between game changes. A poker jackpot award drop log must be maintained to document when the jackpot award drop boxes are exchanged between shift changes. Jackpot award drop boxes must be clearly marked.

Someone independent of the poker room must record the amount of the jackpot award liability on a daily basis on the poker jackpot log. The poker jackpot log must be forwarded to accounting at least once a month, and whenever a jackpot is awarded.

These jackpot award procedures also apply to payout awards for player banked poker games that have imprest banks.

Updating the Jackpot Award

If the licensee offers a patron funded jackpot award, the contribution amount is counted and the award amount is updated daily at the same time each day. Upon completion of the table game count, the count team leader delivers the copy (yellow) of the jackpot count cards to the cashier,

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where the cards are retained until retrieved by the designated person to update the jackpot liability. Alternatively, the count team leader may deliver the copy (yellow) of the jackpot count cards directly to the designated person. The designated person retrieves the jackpot count cards from the cashier or the count team and updates the jackpot liability amount(s) based on the amount(s) counted by the count team. Upon updating the liability amount(s), the jackpot count cards are deposited in the locked accounting box.

See Rule 10 for more information regarding jackpot awards.

Awarding the Jackpot

The jackpot amount awarded to the winner(s) shall be recorded on a two-part form titled table games payout form. Refer to the Table Games section for an example of this form.

The pit supervisor, or his/her designee acting in an administrative capacity, completes the table games payout form which includes, but is not limited to, the following information:

- a. Date,
- b. Shift,
- c. Time,
- d. Table number,
- e. Seat number,
- f. Winning patron information,
- g. Dollar amount of award,
- h. Taxes withheld, and
- i. Net amount awarded to patron.

The pit supervisor signs both parts of the form indicating proper completion of the form and initiates the request for the funds.

An independent verifier (i.e. security) takes both parts of the form to the cage for payment or to the custodian of the poker room imprest bank for payment.

The cashier or the imprest bank custodian counts the funds, verifying the funds agree to the slip, and signs the slip indicating the disbursement of the funds. The verifier transports the funds and the original (white) form to the table. The cashier or imprest bank custodian keeps the copy (yellow) of the table games payout form documenting the disbursement of the funds.

The pit supervisor pays the patron. The independent verifier signs the original (white) form, indicating the amount stated on the table games payout form agrees with the amount given to the patron.

The patron signs the original (white) form upon payment of the award indicating receipt of the funds.

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Once the jackpot is paid, the original (white) table games payout form is immediately deposited in the locked accounting box by the verifier.

C. POKER IMPREST TABLE TRAY BANK EXCHANGE PROCEDURES

Even exchanges of chips, tokens, and/or coins (hereafter, in all subsections, referred to as “chips”) may be made at the cage or the poker room imprest bank. Even exchanges of chips for player banked poker tables with imprest banks located in a pit must be made at the cage and documented on an exchange form.

Even Exchanges With the Cashier Cage

If even money exchanges are made between the player banked poker imprest table tray banks and the cashier cage, the following procedures are performed:

The dealer determines that chips are needed for an even exchange. The dealer removes the necessary currency from the table tray and gives it to the pit supervisor who provides the equivalent amount in lammers.

The pit supervisor must take the currency to the cashier and obtain the desired number of chips in return for the currency.

Once the cashier completes the exchange of currency for chips, the pit supervisor must immediately return to the table with the chips and give them to the dealer who will check the amount of chips for accuracy. The pit supervisor must retrieve the lammers.

Even Exchanges With the Poker Room Imprest Bank

If the licensee operates a poker room imprest bank for exchanges with the player banked poker imprest table tray banks, one of the following procedures must be performed:

The dealer determines that chips are needed for an even exchange. The dealer removes the necessary currency from the table tray and gives it to the pit supervisor who provides the equivalent amount in lammers.

The pit supervisor takes the currency to the poker room imprest bank and exchanges the currency for chips.

The pit supervisor delivers the chips to the dealer at the table. The dealer verifies the amount, places the chips in the tray, and returns the lammers to the pit supervisor.

When poker room imprest banks are in use, an even money transfer of cash from the player banked poker table imprest bank may be made for chips from the poker room imprest bank without the necessity of using lammers. In this case, the dealer and pit supervisor or supervisor’s

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designated licensed poker room employee make the exchange as indicated above without the use of lammers.

Even Exchanges by Dealers

If the licensee operates a poker room where the player banked poker imprest table tray banks are maintained in the poker room, the following procedures may be performed when a dealer is not dealing (i.e., the dealer is not involved in an active game). The following transaction must be conducted in the poker room.

The dealer determines that chips are needed for an even exchange on his/her table tray.

The dealer proceeds to the cage in the poker room or the poker room imprest bank with the tray and removes the necessary currency from the tray. The dealer gives the currency to the cage cashier or pit supervisor, whichever is applicable, to exchange the chips.

Once the cage cashier or pit supervisor completes the exchange of currency for chips and the dealer verifies the amount, the dealer places the chips in the tray.

As the dealer is completing the exchange at the cage or the poker room imprest bank, the utilization of lammers is not necessary.

D. POKER ROOM IMPREST BANK EXCHANGE PROCEDURES

When a poker room imprest bank needs to be replenished with currency and/or chips, an exchange with the cashier cage is made using a poker bank exchange form.

The licensed poker room employee (poker employee) responsible for the bank completes the poker bank exchange form and makes the exchange between the bank and the cashier cage. A runner may be utilized. It is preferred that the runner is from security or surveillance; however, this is not required, but that person must be independent of the pit.

If a runner is not used, either the poker employee or the cashier takes the currency/chips and the exchange form to the cashier cage/poker podium. The poker employee and the cashier verify the currency/chips and sign the exchange form. After receiving and verifying the currency/chips and ensuring the amounts agree, employees sign and return the form to either the poker room imprest bank or the cage with their currency/chips. The poker employee deposits the form in the accounting box.

If a runner is used, the poker employee responsible for the bank gives the form and the currency/chips to a runner, who verifies the currency/chips and signs the form prior to transporting the funds to the cashier. After receiving and verifying the currency/chips from the cashier and ensuring the amounts agree, the runner signs the form and returns the currency/chips to the poker employee responsible for the bank, who then verifies the currency/chips and initials the form indicating receipt. The runner deposits the form in the accounting box.

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The cashier may initiate an exchange of currency/chips with the poker room imprest bank using the methodology stated above.

E. IMPREST POKER BANK INVENTORY PROCEDURES

Poker Room Imprest Bank Inventory Procedures

Poker room imprest banks must be inventoried and verified by the licensee responsible for the bank and another licensed employee at shift opening, shift change and shift closing using an imprest bank inventory form. If the poker room imprest bank is used for more than 12 hours during a gaming day, at least two shifts must be conducted for inventory and shift change purposes. All required gaming documents must be maintained for each shift. The inventory form is deposited into the locked accounting box upon completion. Any overages or shortages must be documented in writing and the gaming manager oversees the investigation of the overages and shortages.

Imprest Table Trays Maintained on the Table

If the imprest table tray banks are maintained on the table, the table tray banks must be inventoried and verified by the pit supervisor and the dealer. Prior to the table being opened for the gaming day and when the table is closed for the gaming day, the pit supervisor and the dealer count the imprest table tray and complete the imprest bank inventory form at the table. If the table is not opened, the imprest table tray bank must be inventoried at least weekly. The inventory form is deposited into the locked accounting box upon completion. When the tables are not in use, the imprest table tray banks are locked.

Imprest Table Trays Maintained in the Cage

If the imprest table tray banks are maintained in the cashier cage, the table tray banks are checked out from and returned to the cashier cage. When the imprest bank is checked out, the cashier and dealer count the imprest tray and complete the imprest bank inventory form at the cashier cage. When imprest table tray banks are not in use, the trays are locked or returned to the cashier. When the imprest bank is checked in, the cashier and dealer count the imprest tray and complete the imprest bank inventory form at the cashier cage. The cashier maintains all inventory forms with the cage paperwork.

Imprest Table Trays Maintained in the Poker Room

If the imprest table tray banks are maintained in the poker room, the trays must be locked in a secured cabinet located in the poker area, which is under surveillance coverage. The imprest table tray banks are checked out from and returned to the secured locked cabinet. When the imprest table tray bank is checked out from the secured locked cabinet, the dealer and another licensed employee count the imprest tray and complete the imprest bank inventory form. When the imprest table tray banks are not in use, the trays are locked in the secured cabinet or returned

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to the cashier. When the imprest bank is checked in, the dealer and another licensed employee count the imprest tray and complete the imprest bank inventory form. The imprest inventory forms are deposited in the locked accounting box upon completion.

F. TABLE GAMES TOURNAMENT PROCEDURES

Refer to ICMP Table Games Section 2 for tournament procedures.

G. EQUIPMENT CONTROL

Refer to ICMP Table Games Equipment Section 15 for table games equipment control.

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FORMS

Following is a description of the forms discussed in this section. In some cases, sample forms are provided. **It is the licensee's responsibility to ensure that all forms meet ICMP requirements.** See General section for further clarification.

Poker Bank Exchange Form

The Poker Bank Exchange Form is used to replenish the poker room imprest bank or the poker table tray bank with chips as an even money exchange with the cashier cage.

Poker Jackpot Award Drop Log

The Poker Jackpot Award Drop Log is used to document the soft drop time and related information for the changing of the jackpot award drop boxes, if different than the regularly scheduled soft drop.

Poker Jackpot Log

The Poker Jackpot Log is used to document information about changes to the poker jackpot award. It is updated on a daily basis, by someone independent of the poker room, with the current poker jackpot award amount. The log is forwarded to accounting at least once a month or whenever a poker jackpot is awarded.

Imprest Bank Inventory Form

Please see the Imprest Bank Inventory Form as described in the Cashier section.

Other Forms

Other forms associated with poker are the Request for Fill/Credit Slip, Fill/Credit Slip, Opener/Closers, Early Table Drop Log (which can be found in the Table Game section); and the Table Games Activity Log (which can be found in the Table Games Equipment section).