

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

SECTION 2

Table Games (Blackjack, House Banked Poker, Craps, Roulette)

A. GENERAL

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

Licensees must have procedures in place to mitigate the possibility of theft and/or cheating when special equipment or game pieces are associated with any table game.

Variation Table Games

The ICMP required for variation table games are the same procedures as outlined in this section.

Pit Area

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

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.

The licensee is responsible for creating a house policy that addresses the situation where a drop box automatically locks itself during the course of play. This policy must ensure for the adequate protection of assets. If the drop box must be replaced, procedures must ensure the contents of the replacement drop box can be combined and attributed to the individual table during the count. If the drop box cannot be repaired or replaced, the table must be closed until a functional drop box is available. Written policy must be provided to the Division upon request.

Pit Supervision

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

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

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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, while temporarily relieving a dealer, 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.

Key Control

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

B. ADDITIONAL PAYOUT PROCEDURES

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

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

Each table offering additional payouts must be clearly marked.

Licensees must receive written approval from the Division prior to offering additional payouts.

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

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Promotional rules involving awards being given for play at a specific table game having no impact on AGP, must be submitted to the Division, in writing, at least seven days prior to the start of the promotion.

C. FILL PROCEDURES

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

The following procedures shall be performed when a manual fill is needed at any table game.

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

The pit supervisor calls a runner¹ and the runner¹ signs the Request For Fill/Credit slip, original (white) and copy (yellow) indicating receipt of the slip. The original (white) slip remains on the table. The runner¹ takes the copy (yellow) of the Request For Fill/Credit slip to the cage to be processed.

The cashier prepares the three-part Fill/Credit slip indicating the following information:

- a. Date,
- b. Time,
- c. Shift,
- d. Game,
- e. Table number,
- f. Dollar amount of chips by denomination, and
- g. Total fill.

The manual Fill/Credit slips are kept in a locked dispensing machine. The cashier signs the Fill/Credit slip verifying the accuracy of the slip and the amount of chips.

The runner¹ verifies the amount of chips and compares the total to the Fill/Credit slip. The runner¹ signs the slip indicating the Fill/Credit slip agrees to the Request For Fill/Credit slip, the amount of chips agree to the slips and receipt of the chips.

The cashier dispenses the original (white) and copy (yellow) of the Fill/Credit slip from the locked dispensing machine. The cashier gives¹ the chips and the original (white) Fill slip to the runner¹.

¹ Group B Control

Difference ↓

For Group C Licensees, the runner must be from security or surveillance. For Group B Licensees, 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.

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The cashier files the copies (yellow) of the Request For Fill/Credit and Fill/Credit slips until the end of the shift.

The runner¹ transports the chips and the original (white) Fill/Credit slip to the pit supervisor at the table as designated on the Fill/Credit slip and places them on the table next to the dealer.

The dealer breaks down at least one stack from the highest denomination chips, verifies the chips, and counts them in full public view prior to placing them in the table tray. The pit supervisor verifies the fill amount by comparing the chips to the Fill/Credit slip and signs the Fill/Credit slip indicating the requested amount of chips was received and the accuracy of the slip.

If there is a discrepancy between the fill amount and the chips received, the runner¹ returns the chips and related slip to the cage.

The dealer signs the Request For Fill/Credit and Fill/Credit slips indicating agreement between the slips and the receipt of the chips indicated on the slips. The dealer places the chips in the table tray. The dealer or supervisor deposits the original (white) Request For Fill/Credit and Fill/Credit slips in the table drop box.

Cross fills or even money exchanges between tables are prohibited.

Automated Pit System Fill Process

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

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

D. CREDIT PROCEDURES

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

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Credit transactions are initiated by the pit supervisor prior to the issuance of credit slips and transfer of chips. The pit supervisor determines there are excess chips in the table bank and the table needs a credit. The pit supervisor obtains a Request For Fill/Credit slip (a two-part form stored in the locked pit podium), checks the credit box, completes the information on the slip, and signs the slip indicating accuracy of the slip and initiation of the credit process.

The dealer counts out the credit in full public view and signs the slip indicating the amount of chips agree to the Request for Fill/Credit slip.

The pit supervisor calls a runner¹. The runner¹ counts the chips to be credited and signs the Request For Fill/Credit slip indicating the amount of chips agree to the slip and receipt of the chips and slip. The original (white) slip remains on the table as evidence of the chips being transported. The runner¹ takes the copy (yellow) of the Request For Fill/Credit slip and the chips to the cashier.

The cashier prepares the three-part Fill/Credit slip indicating the following information:

- a. Date,
- b. Time,
- c. Shift,
- d. Game,
- e. Table number,
- f. Dollar amount of chips by denomination, and
- g. Total of credit.

The cashier counts and compares the chips received with the amount recorded on the copy (yellow) of the Request For Fill/Credit slip and signs both the Request Slip and the Credit Slip indicating the slips agree and as evidence of receiving the chips. The runner¹ verifies the information on the slips and signs the Fill/Credit slip indicating the slips agree. The cashier dispenses the original (white) and copy (yellow) of the Fill/Credit slip from the locked dispensing machine. The copies (yellow) of the Fill/Credit slip and the Request For Fill/Credit slip remain in the cage.

The runner¹ takes the original (white) of the Fill/Credit slip to the table. The pit supervisor and dealer verify the accuracy of the Fill/Credit slip and sign the slip indicating the slips agree. The dealer or supervisor deposits both the Request For Fill/Credit slip and the Fill/Credit slip into the table drop box.

Automated Pit System Credit Process

If the licensee utilizes an automated pit system, the following procedures apply:

¹ Group B Control

Difference ↓

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- The pit supervisor enters the credit information into the computer terminal located in the pit area and a two-part Fill/Credit slip prints in the cage.
- The pit supervisor notifies the runner¹ that a credit needs to be transported.
- The runner¹ proceeds to the cage and picks up both parts of the Fill/Credit slip, original (white) and copy (yellow), and takes both copies to the pit.
- At the pit, the dealer, pit supervisor, and the runner¹ verify the amount to be transported to the cage to the amounts listed on both parts of the Fill/Credit slip.
- The dealer counts the credit in full public view.
- The pit supervisor and dealer sign the original (white) and copy (yellow) of the Fill/Credit slip indicating the proper completion of the slip and verification of the slips.
- The runner¹ signs both copies of the slip indicating receipt of the chips.
- The runner¹ takes the funds and the Fill/Credit slip copy (yellow) to the cage.
- At the cage, the cashier counts the funds received, and compares the counted amounts to the amounts listed on the Fill/Credit slip copy (yellow). If there is a discrepancy between the credit amount and the chips received, the runner¹ returns the chips and related slip to the pit for reconciliation.
- The cashier signs the copy (yellow) of the Fill/Credit slip indicating the chips received agrees with the slip and receipt of the chips while the runner¹ observes the cashier's signing.
- The copy (yellow) Fill/Credit slip is maintained by the cashier and included with the cashier's paperwork for the shift.
- The pit is notified of the completed transaction at the cage and the dealer drops the original (white) of the Fill/Credit slip in the drop box while being observed by the pit supervisor.

E. TABLE OPENING AND CLOSING PROCEDURES

At the beginning and end of each shift, each table game tray must be inventoried by two licensed individuals, in each other's presence (one of which must be a pit supervisor). The inventory is first documented on the two-part Opener/Closer Inventory Form, and then signed by both of the individuals performing the inventory. An inventory must be taken and recorded at the beginning and end of each shift, even if a table has been closed for the entire shift. If a pit system is utilized, the information is entered into the system after the inventory form has been completed and signed by both individuals. The closer is immediately dropped into the current shift's drop box and the opener is dropped in the subsequent shift's drop box. If the licensee uses a multi-shift drop box, the drop box is switched to the next shift position in order to drop the opener. See ICMP Drop and Count Section 5 for more details.

¹ Group B Control

Difference ↓

For Group C Licensees, the runner must be from security or surveillance. For Group B Licensees, 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.

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At the beginning of the first shift of each gaming day (if the pit was previously closed), the inventory of each table tray is verified against the opener. If the opener is not in the table tray, a new inventory form is completed. The opener is immediately dropped into the current shift's drop box.

At the end of the final shift of each gaming day (if the pit will not remain open), a new inventory form is completed and the closer is dropped into the current shift's drop box. The opener is placed in the table tray or dropped in the next shift's box.

F. TABLE GAMES JACKPOT PAYOUT PROCEDURES

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

The pit supervisor verifies the hand to determine the payout is needed. The pit supervisor obtains the Request For Table Games Jackpot Payout Slip (a two-part form located in the locked pit podium), and completes the slip and signs the slip indicating proper completion of the slip and request of the funds.

The pit supervisor calls a runner¹ who signs the original (white) slip and copy (yellow) indicating the receipt of the slip. A picture of the winning hand must be captured and generated through surveillance. On the back of the picture, surveillance notes the game type, table number, player spot, and table games jackpot payout slip number. Surveillance or security deposits the picture in the locked accounting box, or alternatively, the picture may be attached to the copy (yellow) of the payout slip in the cashier cage.

The runner¹ transports the copy (yellow) Request For Table Games Jackpot Payout Slip to the cashier who prepares the three-part Table Games Jackpot Payout Slip indicating the following minimum information:

- a. Date,
- b. Time,
- c. Shift,
- d. Game type variation (e.g., Bonus 6, Three Card Poker),
- e. Table number,
- f. Amount of wager,
- g. Winning hand (e.g., royal flush),
- h. Amount of jackpot payout,
- i. Taxes withheld,
- j. Gambling Payment Intercept withheld, if applicable and

¹ Group B Control

Difference ↓

For Group C Licensees, the runner must be from security or surveillance. For Group B Licensees, 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.

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k. Total funds leaving cage.

The cashier counts the funds requested and signs the Table Games Jackpot Payout Slip indicating the slip agrees with the request slip and disbursement of the funds.

The table games manual jackpot payout slips are kept in a locked dispensing machine. Jackpot payout slips may also be generated from an automated pit system.

The runner¹ verifies the funds, compares the funds to the Table Games Jackpot Payout Slip, and signs the slip indicating the funds agree with the slips and receipt of the funds.

The cashier dispenses the original (white) and copy (yellow) of the Table Games Jackpot Payout Slip from the locked dispensing machine. The copies (yellow) of the Request For Table Games Jackpot Payout Slip and the Table Games Jackpot Payout Slip are maintained in the cage.

The runner¹ transports the funds and the original (white) Table Games Jackpot Payout Slip to the pit supervisor at the table as designated on the slip.

The pit supervisor verifies the Request For Table Games Jackpot Payout Slip with the Table Games Jackpot Payout Slip and the funds, and signs the payout slip indicating the funds agree with the request and receipt of the funds.

The dealer verifies the jackpot payout received agrees to the amount requested and pays the patron. The dealer signs both the request and the payout slips indicating the funds agree to the request, receipt of the funds and payment of the funds to the patron. The patron signs the payout slip indicating receipt of the jackpot funds. The dealer immediately deposits both the Request For Table Games Jackpot Payout Slip and the Table Games Jackpot Payout Slip into the table drop box.

G. TABLE GAMES PERFORMANCE REVIEW

A Table Games Activity Log must be maintained for all table games. The log is used to record all events impacting the table. Such events shall include, but are not limited to, changes in the game rules, changes in the games offered for play, inclement weather, large payouts, suspicious activity of patrons, and irregularities in inventory and drop procedures. The log must be forwarded to accounting at least monthly. A copy of the log may be maintained in the pit.

The owner/operator, table games management or licensee's equivalent, in conjunction with appropriate personnel, investigates any large or unusual fluctuations (as defined in the Written Accounting Plan) of the audited master games sheet, including a review of the daily hold percentage, for each table for each shift. This review must be performed on a timely basis, not to exceed five (5) days from the gaming date being reviewed. The table games activity log should

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be reviewed to determine if activity affecting hold percentage may be explained. The variance investigation may include a review of player activity, review of surveillance coverage, results of random dealer audits, etc. The results of these daily investigations for each table for each shift must be documented.

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

Licensees must have a process in place to escalate month-end variance reviews for game types performing at unusual hold percentages for two or more consecutive months. The procedures employed must be included in the licensee's Written Accounting Plan.

H. TABLE GAMES TOURNAMENT PROCEDURES

Refer to ICMP Poker Section 3 for tournament procedures.

I. TABLE GAMES PROGRESSIVE PROCEDURES

General

Each progressive table game must be linked to a meter showing the "advertised amount," and the "advertised amount" must be visible to all players who may potentially win the progressive jackpot. Each progressive must have a Progressive Tracking Log to document information about and changes to progressive banks. This form must be immediately available to the Division upon request.

Each table's progressive controller box must be housed such that access to the controller requires dual access. A Progressive Controller Access Log must be completed each time the controller is accessed. The progressive controller must continuously monitor each linked table for Coin-In, must calculate the incrementation to the progressive jackpot and update the progressive jackpot display. It is the casino's responsibility to test this functionality prior to allowing patron play, to ensure incrementation and mathematical accuracy. Key control procedures must be in place ensuring no one person has access to the controller or server configuration data.

A Table Games Progressive Jackpot Log must be maintained for all progressives. This log is used to document the progressive liability/meter for the beginning and end of each gaming day, the (progressive drop) coin-in hard meters by table for the beginning and end of each gaming day, the displayed jackpot amount at the time the end of day meters are read, and all progressive jackpots paid. All log entries must be complete, legible and accurate. Explanations for all decreases in the hand pay jackpot amounts must be documented. At the end of each gaming day,

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the pit manager or designee ensures all required information is recorded on the log and the completed log is forwarded to accounting. Additionally, at the end of each gaming day, the pit manager or designee generates the following computer reports: A report showing activity on the game, a report showing (progressive drop) coin-in, and a report of jackpot payouts on the game. The reports are forwarded to accounting by placing them in the locked accounting box.

Malfunctions

Every progressive table and corresponding computer must be connected to an uninterrupted power supply (UPS).

In the event of a malfunction of the table controller or the computer, the progressive feature must be disabled. The licensee may continue the game if there is a method to prevent the progressive wager. Licensees must document malfunctions on the table games activity log.

Payout

When a patron wins a progressive, the casino will verify the win. Once confirmed, a Request for Table Games Jackpot Payout Slip and a Table Games Jackpot Payout Slip will be completed. (See Table Games Jackpot Procedures for more information.) A W-2G may need to be completed, refer to the guidelines established by the IRS, <http://www.irs.gov/>, additionally Gambling Payment Intercept procedures may apply (see Section 1, General Section H).

An optional progressive wager is considered for the calculation of AGP. In turn, when the progressive is awarded, the entire amount is deductible.

J. NON-CASHABLE CHIPS

General

Refer to Rule 12 in the Colorado Limited Gaming Regulations for regulations related to non-cashable chips.

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

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

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In the event of a push, additional hands must be played until a win/loss decision occurs. Non-cashable chips may be stored in the pit, in a separate locked area, when being used for a current promotion. Procedures must be written to ensure proper inventory and security of the chips during the promotion. Procedures must be submitted, in writing, to the Division at least seven days prior to the start of the promotion. A copy of the approved procedures must be maintained in the pit area during the promotion.

Non-cashable chips cannot be accepted for a tip wager or as a tip.

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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.

Additional Payout Request

The Additional Payout Request form must be submitted to and approved by the Division's Audit Section seven days prior to offering the additional payout program. The form must be approved and received back from the Division prior to offering the additional payout program.

Fill/Credit Slip

The Fill/Credit slip is a triplicate form with an alphanumeric numbering sequence. Only one series at a time is issued and used. All un-issued Fill/Credit slips are securely stored and maintained in accounting with the controller/bookkeeper, owner/operator, and gaming manager having access to the slips.

Opener/Closer Inventory Form

The Opener/Closer Inventory form is a two-part form with an alphanumeric numbering sequence. All un-issued opener/closer table inventory forms are securely stored and maintained in accounting with the controller/bookkeeper, owner/operator, and gaming manager having access to the slips.

Progressive Controller Access Log

This form is used to record access to the progressive controller. The log is completed each time the progressive controller is accessed. Refer to ICMP Slots Section 4 for a sample of the log.

Table Games Progressive Jackpot Log

This log is completed daily. It is used to record the progressive meter for the beginning and end of each gaming day, the (progressive drop) coin-in hard meters by table for the beginning and end of each gaming day, and all progressive jackpots paid. At the end of each day this log is forwarded to accounting. .

Progressive Tracking Log

This form must be completed for every bank of linked table progressives. It is used to document information about, and changes to, linked table progressive banks. This form must be immediately available to the Division upon request. Refer to ICMP Slots Section 4 for a sample of the log.

Request for Fill/Credit Slip

The Request for Fill/Credit slip is a two-part form with an alphanumeric numbering sequence. All un-issued request for fill/credit slips are securely stored and maintained in accounting with the controller/bookkeeper, owner/operator, and gaming manager having access to the slips.

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Request for Table Games Jackpot Payout Slip

The Request for Table Games Jackpot Payout slip is a two-part alphanumeric form used to document a payout request for a blackjack or house banked poker game from the cashier cage. All un-issued Request for Table Games Jackpot Payout slips are securely stored and maintained in accounting with the controller/bookkeeper, owner/operator, and gaming manager having access to the slips.

Table Games Activity Log

The Table Games Activity Log is completed each time a significant event that impacts the performance of a table game. The log is forwarded to the Accounting Department at least monthly.

Table Games Jackpot Payout Slip

The Table Games Jackpot Payout slip is a three-part alphanumeric form used to document the payment of a payout for blackjack or house banked poker game from the cashier cage. All un-issued Table Games Jackpot Payout slips are securely stored and maintained in accounting with the controller/bookkeeper, owner/operator, and gaming manager having access to the slips.

Table Games Payout Form

The Table Games Payout form is a two part alphanumeric form used to document the amount awarded to patrons, either for player banked poker jackpot awards, or tournament prizes. All un-issued Table Games Payout forms are securely stored and maintained in accounting with the controller/bookkeeper, owner/operator, and gaming manager having access to the slips.