

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

SECTION 15

TABLE GAMES EQUIPMENT

The licensee must inspect and approve all gaming equipment in the table games area before use. All surveillance systems and camera coverage of all gaming activity and devices must receive initial approval from the Division prior to being utilized. After the initial approval, the licensee will approve all changes to its cameras. The procedures in this section do not apply to player-banked poker.

All gaming equipment must be maintained in good working order or removed from play. This includes, but is not limited to, card shoes, automatic card shufflers, dice, roulette wheels, roulette balls, drop boxes, dealer tip boxes and table tray lids.

A. TABLE GAMES ACTIVITY LOG

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.

B. CARD AND DICE INVENTORY

The licensee is required to have a locked storage area for cards and dice. The licensee may have both a secondary and primary storage area located in a secure location approved by the Division. All primary and secondary storage areas shall have two separate locks. The Security Department shall maintain one key, and the Table Games Department shall maintain the other key.

The licensee may utilize the pit podium for storage of card and dice inventory. The licensee may store as many sets of cards and dice necessary for daily operations in the pit podium. The pit podium, when utilized at this capacity, will not be considered secondary storage.

Licensees are required to develop procedures and maintain logs that indicate a correct inventory of cards and dice from receipt to cancellation and/or destruction. The inventory logs must be accurate, legible, and easy to understand. The casino is required to have staff immediately available that understand the inventory process/logs and can explain any inquiry from the Division during inspections.

A Card and Dice Storage Inventory Log that documents when cards and dice are received into storage and removed to the floor shall be maintained in the storage area and be subject to review by the Division upon request.

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

A Card and Dice Pit Inventory Log that documents when cards and dice are received at the pit podium and removed for destruction shall be maintained in the pit area and be subject to review by the Division upon request.

A Card and Dice Cancellation/Destruction Log that documents when cards and dice are cancelled/destroyed shall be maintained in the destruction area and be subject to review by the Division upon request.

On a quarterly basis, accounting or the internal compliance officer must perform a physical count and reconcile to the card and dice inventory and cancellation/destruction logs. Once the reconciliation is completed, accounting (or the internal compliance officer) shall sign off on the ending inventory. The reconciliation is forwarded to table games management acknowledging the results of the inventory.

C. CARD AND DICE INSPECTION AND CONTROL

The licensee shall inspect all cards and dice prior to use in a game. The front and back of each card must be checked to ensure that it is not flawed, scratched or marked in any way. Each die must be inspected with a micrometer, balancing caliper, a steel set square and a magnet, or any other instrument approved by the Division. These tools must be maintained in the pit area and made available for use by the Division upon request.

When a card or die is found marked, bent, flawed, and unusable or tampered with in any way during the course of play, a new card or set of dice will be issued to the game. Any card or die found to be flawed, damaged or tampered with, either prior to play or during the course of play, shall be placed in a sealed envelope or container, labeled with the table name, date, time and signature or initial of the dealer/box person and pit supervisor. Where a licensee has no reason to believe that damaged or flawed cards or dice in a sealed envelope or container were damaged or flawed as a result of an unlawful act, motive, or scheme, the licensee may dispose of such cards and dice after 30 days in any manner designed to prevent their future use in limited gaming.

Cards and dice must be protected at all times. When a table has not had any play for 30 minutes, the cards must be spread or placed in the discard rack except for tables that utilize a shoe or shuffling device. Dice that have been placed in a cup for use in gaming shall never be left unattended and shall never remain on a table for more than 24 hours.

D. CARD AND DICE CANCELLATION/DESTRUCTION

Destruction of cards removed from play must be by shredding or by other means approved by the Division. Cancellation of logo cards must be by drilling a circular hole of at least one fourth inch (1/4") in diameter through the center of each card in the deck or by other means approved by the Division.

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The licensee may destroy dice by drilling a circular hole of at least three-sixteenths of one inch (3/16”) in diameter through the center. All dice removed from a game, except those retained for Division inspection must be immediately cancelled to prevent reintroduction of the dice to the game. Cancellation must occur by use of a cancellation tool, scribe or any other tool to produce a cancellation mark that is permanent and clearly visible on each die. Licensees have the option to destroy the cancelled dice.

E. COMMUNICATION EQUIPMENT

Licensees using mobile ATM devices at gaming tables must develop controls over the mobile hardware to ensure that data from these devices is secure. This would include ensuring that unauthorized applications used to capture and report on patron data in an unauthorized manner are not installed on the mobile devices.