



Minimum Bankroll Requirements

The Division has identified several casinos operating in, or very close to, a deficiency on the Minimum Bankroll Analysis (MBA) during periods when gaming volumes change significantly. Several of the deficiencies were noted when a holiday falls on the last weekend of a month. The Division is concerned that licensees are not consistently forecasting the cash flow needs to ensure the bankroll is properly satisfied during seasonal changes in gaming volume. An MBA worksheet must be prepared by each licensed entity on a basis as frequent as necessary to determine whether a cash deficiency exists. Also note that as detailed in the instructions to the MBA, cash in a gaming device is not included in the MBA.

ICO Checklists

Because extensive changes are being made to ICMP Sections 6, 7, and 8, primarily as a result of Rule 12 changes, the ICO checklists for Slot Monitoring Systems, Wireless Handheld Validation and Ticket In/Ticket Out are changing considerably.

In light of that, the Division is giving a reprieve on the completion of the ICO checklists for those sections for the January/February 2015 review period. The ICO checklists and ICMP revisions will have an effective date of March 1, 2015. The ICO checklist completion for the new Gaming Systems, Gaming Systems Testing and Ticket In/Ticket Out Sections will need to be resumed starting with the March/April 2015 review period.

Combined ICO Checklist

As recommended by the industry, the multiple sections of the ICO Checklist have been combined into a single file. The multiple sections of the ICO Attribute Worksheets have also been combined into a single file. Licensees have the option of working with either the individual or the combined files. The combined Checklist and Attribute Worksheet files may make it easier to work with or to print out.

Adjustments

ICMP Slot Monitoring System section states anytime the automated system fails to communicate accurate meters, licensees must revert to the manual capture and recording of soft meters, and use the soft meters in the generation of the required statistical reports.

When making adjustments to meter information ensure your adjustments are supported with meters. Likewise, when making adjustments to actual information the supporting documents must be actual data. For example:

Licensee's that utilize the ATI system may see a variance on the Bill In Meter Exception report where the Bill In meter does not agree to the individual bill meters. Using the data from the Diagnostic Monitor Transaction Tab would not be adequate support for a meter adjustment as the data in the Diagnostic Monitor Transaction Tab is based on actual information. The licensee may consider capturing meters from the Live Meters Tab, reading soft meters on the machine or utilizing another system report that states meter data.



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When making actual adjustments to actual drop data, a good supporting document would be the Bill Drop by Denomination report. Switched or comingled actual funds adjustments could be supported by printing page(s) of this report to show individual machine bill denomination variances.

ICMP Changes

The Internal Control Minimum Procedures (ICMP) have been updated and sent to the General Managers and Internal Compliance Officers as of January 30, 2015.

The Technical Systems Group (TSG) has made some significant changes to Sections 6 and 7 and moved some procedural processes into Section 8. These changes bring about a new review process for TSG and the Casinos. In light of these changes, there is going to be an overview meeting to explain the changes and new processes specific to Sections 6 and 7. Sections 6 and 7 will have the biggest impact on the IT and ICO departments; therefore, TSG is requesting at least one employee from each of these departments attend the meeting. The meeting will be held right after the Slot Tech meeting in Central City on February 4, 2015, 9:00 am at Johnny Z's Casino (3rd floor), and in Cripple Creek on February 11, 2015, 9:30 am at the Division of Gaming Office.

The Audit Section has also updated several sections of the ICMP. The updated sections are: 1-General, 2-Table Games, 4- Slots, 5- Drop and Count, 9-Cashier, 10- Key Control, 11- Accounting, 14-Dealer Tips, and 17- Terminology.

In addition modifications were made to the Notification Requirements, Tax Template, Table Games Forms, and the Duplicate Key Log.

The proposed changes can be found on the Division's web site, under Laws and Regulations, ICMP. At the bottom of the ICMP page there is a section labeled, "Proposed ICMP." Please send your comments to Paul.Hogan@state.co.us by February 20, 2015. The anticipated effective date is March 1, 2015.

Table Games Update

On January 14, 2015 four new games became effective in the rules: the blackjack variation games, Lucky Lucky, and War Blackjack; the poker variation game High Card Flush; and the first roulette variation game Back2Back Roulette. There is currently only one table game being field trialed, Galaxy Gaming's WPT Head's Up Hold'em. The game has been in trial at the Saratoga Casino in Black Hawk and the Brass Ass Casino in Cripple Creek. It will be presented to the Gaming Commission at the February 19, 2015 Meeting.

In addition to the new game, the Division will be presenting a rule change for Rule 9, 47.1-901 Drop Procedures and Rule 11, 47.1-1101 Drop and Count Procedures at the February 19, 2015 Gaming Commission meeting. Currently all house banked and player banked games must be dropped at the end of a shift or the end of day whether or not there has been any play on that table. The rule change will allow casinos to submit a plan to drop certain tables only on the days they actually have play. The Division will only entertain a drop schedule plan for casinos that have secondary pits (i.e. pits only open on the weekends) that are consistently closed on



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specific days of the week and are properly included on monthly drop and count schedules submitted to the Division.

The Division is in the process of changing two ICMP's as they relate to table games. In Section 2: Table Games (Blackjack, House Banked Poker, Craps, Roulette), A. General, Pit Supervision, we are removing the language that allowed a pit supervisor to relieve a dealer for emergency purposes only and the language that stated a relief dealer needed to be used for regular "break" periods. The change will allow casinos to staff their pits as necessary for their business requirements. A supervisor will be able to open up a table, keep a table going when the regular dealer leaves for any reason or to break dealers. Proper supervision of the pit is still required as per the Casino's Pit Supervision plan previously submitted to the Division. The second change will be in Section 14 Dealer Tips, A. General Requirements. We are changing the language that required a dealer receiving a tip in the form of currency to immediately place it in his/her tip box. The change will allow the dealer, per house policy, to select an equivalent value in chips and then place it in his/her tip box. These ICMP's will be effective March 1, 2015.

Please contact the Division's Table Games Committee Chairman, Investigator Sean Ballain, with any comments, questions, or concerns.

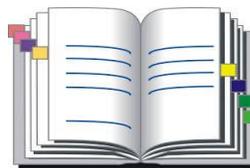
Device Counts

Please be aware that effective March 1, 2015 all device counts must be submitted to the Tax Examiner via email to dor_coloradocasinos@state.co.us no later than the

second day of the month. The device counts will no longer be submitted to the Central City or the Cripple Creek offices.

Expiring Variances

Internal Control Minimum Procedures (ICMP) Variance Renewal Requests can be submitted up to three months before their expiration date. If there are any changes to the renewed variance request, you must submit a new request. If the renewal requires no changes you can send an email requesting the specific variance number to be renewed and note "no changes". Please email renewal requests to dor_coloradocasinos@state.co.us



Reminder

Please verify the Contact information you have provided to the Division is current. Specifically, double check that the contact provided for the Device Tracking, Personnel Tracking, Tax Return and the Gambling Payment Intercept is correct. Also confirm phone numbers, emails and faxes are accurate as well. When there are any changes in the contact information provided to the Division of Gaming, remember to forward the updated information to the Division's email address in a timely manner, dor_coloradocasinos@state.co.us.

When applying for a new license or renewal, please remember to use the most current applications. The most up-to-date original and renewal applications are available on the Division of Gaming's website.



Please remember to have licensed casino employees report address and telephone number modifications to the Division within 10 days of the alteration.

Please remember to use the most current forms on the Division's website.

Upcoming ICO meetings

The upcoming ICO meetings will be held in May. You are encouraged to submit any questions or topics of discussion that you would like addressed either by the Division or your fellow ICOs. Please call or email your questions or topics to:

dor_coloradocasinos@state.co.us, or

Roger Pinson (303) 205-1372, or
roger.pinson@state.co.us

Laurie Scott (719) 689-3362,
laurie.scott@state.co.us

ICO Meetings

Tuesday, May 5, 2015 – Cripple Creek at the Wildwood Casino, 10:00 am

Thursday, May 7, 2015 – Central City/Black Hawk, at the Division's Central City Office Commission Room, 10:00 am

Commission Meeting Dates:

- Thursday, February, 19, 2015 in Golden
- Thursday, March 19, 2015 in Golden
- Thursday, April 16, 2015 in Golden
- Thursday, May 21, 2015 in Golden
- Thursday, June 18, 2015 in Golden
- Thursday, July 16, 2015 in Golden
- Thursday, August 27, 2015 in Golden *4th Thursday
- Thursday, September 17, 2015 in Cripple Creek
- Thursday, October 15, 2015 in Central City
- Thursday, November 19, 2015 in Golden
- Thursday, December 17, 2015 in Golden

New Website

Please check out the Division's new web site, <https://www.colorado.gov/enforcement/gaming>. Some helpful features on the main page are the EZ File link, GIP link, and the Upcoming Gaming Events Calendar. A benefit to all ICO's found under Links and Casino Information, is a quick link to the ICMP and ICO Information. The ICO Information contains the ICO checklists and the attribute worksheets.

USEFUL WEBSITES:

The Drop & Count Schedule, Minimum Bankroll Worksheet, and Tax Template are located at:

<https://www.colorado.gov/enforcement/node/37861>

ICO checklist and attribute worksheets:

<https://www.colorado.gov/pacific/enforcement/node/38316>

License Applications:

<https://www.colorado.gov/pacific/enforcement/node/38571>

ICMPs:

<https://www.colorado.gov/pacific/enforcement/node/37861>