

**Commission Meeting**  
**Revised Agenda**  
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**Location of Meeting:**

Red Lion Hotel of Olympia  
2300 Evergreen Park Drive  
Olympia, WA (360) 943-4000

**Date and Time of Meeting:**

Thursday, February 8, 2007  
1:30 p.m.

**Informal Study Group Sessions:**

**10:00 a.m. – 11:00 a.m.** Charitable Nonprofit Study Session  
**11:00 a.m. – Noon** Commercial Operators Study Session

**Public Meeting:**

Please note agenda items after 1:30 p.m. may be taken out of sequence at the discretion of the Chair.

**1. Agenda Review / Director's Report:**

a) Hearings on Proposed Rule Changes

b) Legislative Update

**Amy Hunter, Administrator**

***Agency Request Legislation:***

- House Bill 1218 / Senate Bill 5376 – Commission Powers and Duties
- House Bill 1345 / Senate Bill 5375 – Penalties for Underage Gamblers
- House Bill 1346 / Senate Bill 5374 – Barring List

***Other Bills:***

- Senate Bill 5055/House Bill 1706 – Removing Sunset Clause for Limited Waiver of Sovereign Immunity
- House Bill 1243 – Internet Gambling Exemption
- House Bill 1257 – Legislative Approval of Compacts
- House Bill 1449 – Public Disclosure Exemption for Financial Statements
- House Bill 1477 / Senate Bill 5558 – Regulating House-Banked Social Card Games/Zoning
- House Bill 1599 – Allowing Raffles by State Employees

c) Correspondence:

- Representative Richard Curtis Ex Officio Appointment to Gambling Commission

d) Monthly Update Reports:

- Administrative Case Update

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- Seizure Update
- Congressional Update

e) News Articles

**Comments from the Public**

2. **New Licenses and Tribal Certifications:** David Trujillo, Assistant Director

3. **Defaults:** Melinda Froud, Staff Attorney

- a) Robert Barclay-Yelm, Class III and Card Room Employee Revocation
- b) James McMurray-Shoreline, Card Room Employee Revocation

**Petition for Reconsideration:** 3:30 p.m.

- c) Dave Swyter Bruce Marvin, Assistant Attorney  
General

4. **Request for Summary Suspension:**

**Rules Up for Discussion**

5. **Petition for Rule Change – Increasing Poker Wagering Limits from \$25 to \$40**

*Filed 12-01-06 as a Pre-Proposal Statement of Inquiry (CR-101) under WSR #06-24-052.*

Mark Harris, Assistant Director

- a) **Amendatory Section WAC 230-40-120**  
Wagering limits in card games.

6. **Rules Simplification Project** Beth Heston, Project Manager

*Filed 03/17/06 as a Pre-Proposal Statement of Inquiry (CR-101) under WSR #06-07-111. Filed 12/04/06 as a Proposed Rule Making (CR-102) under WSR # 06-24-057 with a published date of 12/20/06.*

- a) **New Chapter 230-15**  
Card room rules.  
*This chapter won't become effective until 01-01-08.*
- b) **Amendatory Section WAC 230-15-065**  
Enforcement of card game rules of play.
- c) **Amendatory Section WAC 230-15-126**  
Cutting cards in center dealer dealt games.
- d) **Amendatory Section WAC 230-15-150**  
Selling and redeeming chips.

- e) **Amendatory Section WAC 230-15-275**  
Surveillance requirements for Class F card rooms.
- f) **Amendatory Section WAC 230-15-285**  
Camera and monitor requirements for closed circuit television systems.
- g) **Amendatory Section WAC 230-15-320**  
Surveillance room requirements for house-banked card game licensees.
- h) **Amendatory Section WAC 230-15-400**  
Accounting for player-supported jackpot funds.

7. **Rules Simplification Project** **Beth Heston, Project Manager**  
*Filed 03/17/06 as a Pre-Proposal Statement of Inquiry (CR-101) under WSR #06-07-111. Filed 12/04/06 as a Proposed Rule Making (CR-102) under WSR # 06-24-061 with a published date of 12/20/06.*

- a) **New Section WAC 230-15-319**  
Retaining video recordings.  
*This rule won't become effective until 01-01-08.*

8. **Other Business/General Discussion/Comments from the Public**

**Executive Session to Discuss Pending Investigations, Tribal Negotiations & Litigation; and Adjournment**

Upon advance request, the Commission will pursue reasonable accommodations to enable persons with disabilities to attend Commission meetings. Questions or comments pertaining to the agenda and requests for special accommodations should be directed to Shirley Corbett, Executive Assistant at (360) 486-3447 or TDD (360) 486-3637. Questions or comments pertaining to rule changes should be directed to Susan Arland, Rules Coordinator and Public Information Officer at (360) 486-3466.

**Commission Meeting Agenda**  
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**Location of Meeting:**

Red Lion Hotel of Olympia  
2300 Evergreen Park Drive  
Olympia, WA (360) 943-4000

**Date and Time of Meeting:**

Friday, February 9, 2007  
9:00 a.m. **(Please Note Early Start Time)**

9. **Consideration of a Class III Gaming Compact:**  
Spokane Tribe of Indians

**Rick Day, Director**

10. **Approval of Minutes:** Regular Meeting, January 11 & 12, 2007

**Rules Up for Final Action**

11. **Petition for Rule Change – Recreational Gaming Association**

*Filed 10-27-06 as a Pre-Proposal Statement of Inquiry (CR-101) under WSR #06-22-050. Filed 12/15/06 as a Proposed Rule Making (CR-102) under WSR # 07-01-057 with a published date of 01/03/07.*

**Beth Heston, Project Manager**

- a) **Amendatory Section WAC 230-40-835**  
Accounting controls for cashier cage.
- b) **Amendatory Section WAC 230-40-865**  
Distributing chips and coins to tables — Requests and fills — House-banking.
- c) **Amendatory Section WAC 230-40-870**  
Removing chips and coins from tables — Requests and credits — House-banking.
- d) **Amendatory Section WAC 230-40-885**  
Count procedures — House-banking.

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## **Rules Up for Discussion and Possible Filing**

- 12. Rules Simplification Project **Beth Heston, Project Manager****  
*Filed 05/18/06 as a Pre-Proposal Statement of Inquiry (CR-101) under WSR #06-11-109.*
- a) New Chapter WAC 230-07**  
Charitable and nonprofit rules.  
*This chapter won't become effective until 01-01-08.*
- 13. Rules Simplification Project **Beth Heston, Project Manager****  
*Filed 03/17/06 as a Pre-Proposal Statement of Inquiry (CR-101) under WSR #06-07-110.*
- a) New Chapter WAC 230-10**  
Bingo rules.  
*This chapter won't become effective until 01-01-08.*
- 14. Business/General Discussion/Comments from the Public/Adjournment**

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## Rule Up For Discussion

Proposed Amendment to  
WAC 230-40-120  
Limits on wagers in card games.

ITEM 5(a) on the February 8, 2007, Commission Meeting Agenda.	Statutory Authority 9.46.070
Who proposed the rule change?	
Andrew Kimmerle, poker player.	
Proposed Change	
The petitioner requests that poker wagering limits be increased from \$25 to \$40.	
<b>Attachments:</b> <b>Memo regarding the Legislative Record dated January 24, 2007.</b> Petition for Rule Change dated November 30, 2006. Proposed amendment to WAC 230-40-120. 82 signatures from poker players supporting Mr. Kimmerle's petition. RCW 9.46.010 Minutes from the October 2005, and January 2006, Commission meetings (Blue paper).	
History of Rule	
The wagering limit for poker is \$25. Poker wagering limits were increased from \$10 to \$25 in May 2000.	
Currently, the total amount a player can wager in a poker game with five rounds is \$500 per hand. Current rules allow a maximum of four wagers/raises per round, and five wagering rounds ( $\$25 \times 4 \times 5 = \$500$ ).	
The petitioner requests that poker wagering limits be increased from \$25 to \$40. The change would increase the total amount a player could wager in a poker game, with five rounds per hand, from \$500 to \$800. For example, the maximum wager would occur in poker games which have four wagers/raises per round, and five wagering rounds ( $\$40 \times 4 \times 5 = \$800$ ).	
For Texas Hold'em games, there are four betting rounds. Licensees usually offer games with \$4/\$8 and \$8/\$16 betting structures. Currently, under typical "house rules", the standard highest betting structure would be \$12/\$24.	
1 <sup>st</sup> Round: Dealt cards: \$12 wager, \$12 raise, \$12 raise, \$12 raise = \$48	
2 <sup>nd</sup> Round: Flop: \$12 wager, \$12 raise, \$12 raise, \$12 raise = \$48	
3 <sup>rd</sup> Round: Turn: \$24 wager, \$24 raise, \$24 raise, \$24 raise = \$96	
4 <sup>th</sup> Round: River: \$24 wager, \$24 raise, \$24 raise, \$24 raise = \$96	
Texas Hold'em maximum wager: $\$48 + \$48 + \$96 + \$96 = \$288$	
Although the \$12/\$24 scenario is the highest betting structure under typical "house rules", licensees could, in theory, have \$25 wagers/raises in each round for a total of \$500 ( $\$25 \times 4 \times 5$ ).	
The petitioner is a poker player and is requesting a \$40 wager limit. Under his proposal, card rooms could offer a \$15/\$30 or \$20/\$40 betting structure because they would not be exceeding the \$40 betting limit. The increase would affect a Texas Hold'em game as follows:	
1 <sup>st</sup> Round: Dealt cards: \$20 wager, \$20 raise, \$20 raise, \$20 raise = \$80	
2 <sup>nd</sup> Round: Flop: \$20 wager, \$20 raise, \$20 raise, \$20 raise = \$80	
3 <sup>rd</sup> Round: Turn: \$40 wager, \$40 raise, \$40 raise, \$40 raise = \$160	
4 <sup>th</sup> Round: River: \$40 wager, \$40 raise, \$40 raise, \$40 raise = \$160	
Texas Hold'em maximum wager: $\$80 + \$80 + \$160 + \$160 = \$480$	

The limits at tribal casinos are \$500 per wager. Staff checked with several tribal casinos and were told there isn't a typical betting structure for Texas Hold'em games played at tribal casinos. Wagering limits ranged from \$20/\$40 to the maximum of \$500.

In October 2005, the Commission filed a petition submitted by the Recreational Gaming Association requesting poker wagering limits be increased from \$25 to \$100. The change would have significantly raised the stakes in poker games. For example, a poker player in a game with five wagering rounds, and four wagers/raises per wagering round, could bet as much as \$2,000 (\$100 x 5 x 4). The Commission denied the petitioner's request at the January 2006, Commission meeting (See attached excerpts from the October 2005, and January 2006, Commission meeting minutes – blue paper).

**Impact of the Proposed Change**

A wager increase would not take additional staff time to regulate. Staff would continue to ensure compliance through routine regulatory visits. If licensees exceeded the \$40 wager limit, staff would follow-up and investigate the matter.

**Regulatory Impact**

None.

**Resource Impacts**

Minimal.

**Policy Consideration**

May be perceived as an expansion of gambling.

**Statements Supporting the Proposed Rule Change**

See attached petitions from 82 players.

**At the January 2007, Commission meeting:**

**John Lowman, licensed distributor representative, testified he thought this would help businesses that were struggling.**

**George Teeney, house-banked card room licensee representing himself, thought this was a very minimum request, compared with the Spokane compact, which has greater increases.**

**Statements Opposing the Proposed Rule Change**

None.

**Licensees Directly Impacted By the Change**

House-banked card room licensees that offer poker games, Class D, E and F card rooms.

**Staff Recommendation**

This is a policy decision and the Commission should consider whether or not the proposal is consistent with the legislative intent expressed in RCW 9.46.010 (attached).

**Proposed Effective Date for Rule Change**

The petitioner requests the change become effective 31 days from filing.

## **Amendatory Section:**

### **WAC 230-40-120 Limits on wagers in card games.**

Social and public card room licensees shall not allow wagering limits set by the commission to be exceeded in any card game. The number and value of wagers in card games are limited as follows:

#### **Nonhouse-banked card games.**

- (1) Poker:
  - (a) There shall be no more than five betting rounds in any one game;
  - (b) The maximum number of wagers in any betting round shall be four, comprised of an initial wager plus three raises; and
  - (c) The maximum amount of a single wager shall not exceed (~~twenty-five~~) forty dollars;
- (2) Games based on achieving a specific number of points - each point shall not exceed five cents in value;
- (3) An ante, except for panguingue (pan), shall not be more than the maximum wager allowed for the first betting round for any game. The ante may, by house rule, be made by one or more players, but the total ante may not exceed the maximum wager allowed for the first betting round. An ante, by house rule, may be used as part of a player's wager;
- (4) Panguingue (pan) - the maximum value of a chip for a payoff shall not exceed ten dollars. An ante will not exceed one chip. Doubling of conditions is prohibited. Players going out may collect not more than two chips from each participating player;

#### **House-banked card games.**

- (5) Licensees authorized to conduct house-banked card games shall not allow a single wager to exceed two hundred dollars;
- (6) A single wager may be made for each decision made by the player before additional cards are dealt or revealed. In addition, for blackjack, an additional wager may be placed for doubling down or splitting pairs; and
- (7) Bonus wagers for house-banked progressive jackpots shall not exceed one dollar. Bonus wagers with a predetermined prize amount based upon a separate element of chance within the same game shall not exceed the authorized maximum table limits as described in subsection (5) of this section.

# Rules Up For Final Action



**Proposed Amendments to:**

- WAC 230-40-835 Accounting control's cashier's cage.
- WAC 230-40-865 Distribution of chips and coin to tables – Requests and fills - House-banking.
- WAC 230-40-870 Removing chips and coins from tables – Requests and credits – House-banking.
- WAC 230-40-885 Count procedures – House-banking.

ITEM 11(a)-(d) on the February 9, 2007, Commission Meeting Agenda. Statutory Authority 9.46.070
Who proposed the rule change?
Dolores A. Chiechi, on behalf of the Recreational Gaming Association, Olympia, WA
Proposed Change
<p>The petitioner is seeking exceptions from performing required daily accounting functions on weekends and holidays. The proposed rule changes would no longer require house-banked operators to have accounting staff perform some daily accounting functions on weekends and/or holidays. Instead, they would perform these functions on the day following the weekend or holiday.</p> <p>The petitioner is proposing to add wording to each of the mentioned rules as follows: “Provided, if the accounting department does not work on weekends or federal or state holidays, they must complete these duties on the next day that they work.”</p> <p>Change made after the November 2006, Commission meeting:  WAC 230-40-835 (tan paper): Language was amended to clarify that the daily gaming activity must continue to be reconciled on the weekends (Amended #1).</p>
History of Rule
<p>WAC 230-40-835 requires the <b>daily</b> cage documentation to be forwarded on a daily basis to the accounting department for agreement with other forms and records.</p> <p>WAC 230-40-865 and WAC 230-40-870 require accounting <b>to remove each day</b> the triplicate copies of fill and credit slips from the locked dispenser (Whiz Machine) maintained in the cashier's cage. Further the accounting department must compare for agreement all copies of “void” fill/credit slips, <b>on a daily basis</b>.</p> <p>WAC 230-40-885 requires <b>each day</b> following the count accounting will, on a test basis, compares for agreement forms and records generated from the count process and the <b>prior days</b> gambling activity.</p> <p>These same changes were recommended by staff as part of the Rules Simplification Project (RSP) and were filed at the October Commission meeting. The RSP card room rules that address this process are WAC 230-15-520 and WAC 230-15-625. This petition's wording is identical to the wording in the RSP version of WAC 230-15-625.</p>
Impact of the Proposed Change
<p>The change would allow the operator to maintain the completed triplicate copy of fill/credit slips in the locked dispenser over the weekend and on holidays.</p> <p>The petitioner believes card room operators incur an unnecessary labor expense by requiring the accounting department to be staffed seven days a week to meet the current requirement for daily removal of completed forms in the fill/credit dispenser.</p>

Regulatory Concerns

None. Staff does not anticipate any regulatory concerns.

These changes will not change the requirement to have all cage documents (with the exception of the third copy of the fill/credit slip) and all count documents be transported and secured in accounting on a daily basis.

Resource Impacts

None.

Policy Consideration

None.

Statements Supporting the Proposed Rule Change

Letters from Hawk's Prairie Casino and Buzz Inn Casino.

**Received after the January 2007, Commission meeting:  
Letter from New Phoenix and Last Frontier Casinos (Blue paper).**

Statements Opposing the Proposed Rule Change

None.

Licensees Directly Impacted By the Change

House-banked card room licensees.

Staff Recommendation

Adoption.

Proposed Effective Date for Rule Change

The petitioner requests the change take effect 31 days from filing.

Change made after the November 2006, Commission Meeting  
Amended #1

**Amendatory Section:**

**WAC 230-40-835 Accounting controls for cashier's cage.**

Licenses required to maintain a cashier's cage shall adhere to the following controls to ensure proper accountability for funds. The following restrictions and procedures apply to cashiers and the cage:

- (1) Cashiers shall be responsible for at least the following functions:
  - (a) Receive cash, checks, and gaming chips from patrons for check consolidations, total or partial redemptions or substitutions;
  - (b) Receive gaming chips from patrons in exchange for cash;
  - (c) Receive traveler's checks and other cash equivalents (including money orders, certified checks, and cashier's checks) from patrons in exchange for currency or coin;
  - (d) Receive documentation with signatures thereon, required to be prepared for the effective segregation of functions in the cashier's cage;
  - (e) Receive from security department personnel, chips and coins removed from gaming tables in exchange for the issuance of a credit;
  - (f) Receive from security department members, requests for fills in exchange for the issuance of a fill slip and the disbursal of gaming chips;
  - (g) Receive cash or chips from the count room;
  - (h) At the end of each shift, the cashiers assigned to the outgoing shift shall count each cage inventory item and record on a cashier's count sheet the face value of each inventory item and the total of the opening and closing inventories. The total closing inventory shall be reconciled with the total opening inventory;
  - (i) Prepare the overall cage reconciliation and accounting records; and
  - (j) Perform such other functions as necessary to ensure proper accountability of funds and chips consistent with these standards.
- (2) Signatures attesting to accuracy shall, at a minimum, be contained on the following:
  - (a) Cashier's count sheet; and
  - (b) Cage inventory countsheet, which includes the signatures of the cashiers assigned to the incoming and outgoing shifts.
- (3) At the conclusion of the daily gaming activity, copies of the cashier's count sheet, cage inventory count sheet and related documentation shall be forwarded to the accounting department for agreement of opening and closing inventories, and agreement of amounts thereon to other forms, records and documentation for recording of transactions: Provided, That if the accounting department does not work on weekends or federal or state holidays, the triplicate copy of the fill/credit slip must be removed and ~~the daily gaming activity reconciled~~ sent to accounting on the next day that the accounting department works.

**Bold = Changes made after the November 2006, Commission meeting.**



## **Amendatory Section:**

### **WAC 230-40-865 Distributing chips and coins to tables — Requests and fills — House-banking.**

Gaming chips and coins shall only be distributed to gaming tables with adequate security and in a manner that ensures proper control and accountability. The following restrictions and procedures apply:

#### **Fill slip.**

(1) Each "fill slip" shall be serially prenumbered three-part forms, which provide an original and duplicate copies as necessary: Provided, That the director may authorize use of a computer based accounting system which includes a nonrepeating sequential numbering system that is consistent with the controls and safeguards of the manual system. Requests for fills shall be a two-part form which provides an original and duplicate copy. These forms shall be controlled in the following manner:

(a) Each series of fill slips received by a licensee shall be controlled and accounted for separately;

(b) Request for fills shall be secured in such a manner that only a gaming operations supervisor has access;

(c) Fill slips shall be secured by the cashier's cage;

(d) These forms shall be used in sequential order and all forms accounted for; and

(e) The preparer shall void forms that have errors by marking "VOID" on both the original and duplicate copies and sign the form.

#### **Request for fill.**

(2) A "request for fill" shall be prepared by the gaming operation supervisor to authorize the cage to prepare a "fill slip" for the distribution of chips and coins to gaming tables. The original and duplicate of the request for fill shall include the following entries:

(a) The date, time, and shift of preparation;

(b) The denomination of gaming chips or coins to be distributed to the gaming tables;

(c) The total amount of each denomination of gaming chips or coins to be distributed to the gaming tables;

(d) The game and table number to which the gaming chips or coins are to be distributed;

(e) The signature of the gaming operation supervisor; and

(f) The signature of the security department employee that distributed the chips and coins.

#### **Transporting requests.**

(3) After preparation of the request for fill, the original of such request shall be transported directly to the cashier's cage by security.

#### **Duplicate copies of the request.**

(4) The duplicate copy of the request for fill shall be placed by the dealer or floor supervisor in public view on the gaming table to which the gaming chips or coins are to be received. Such duplicate copy shall not be removed until the chips and coins are received, at which time the request for fill and fill slip are deposited in the drop box.

### **Fill slip procedures.**

(5) A fill slip shall be prepared by a cashier whenever gaming chips or coins are distributed to the gaming tables from the cashier's cage. The following procedures and requirements shall be observed with regard to fill slips:

(a) Each series of fill slips shall be in triplicate form to be kept in a locked dispenser that will permit an individual fill slip in the series and its copies to be written upon simultaneously while still located in the dispenser, and that will discharge the original and duplicate while the triplicate remains in a continuous, unbroken form in the dispenser: Provided, That if a computer system is used, which includes a nonrepeating sequential numbering system, the controls and safeguards of the manual system must be present; and

(b) Access to the triplicate copy of the form shall be maintained and controlled at all times by an accounting department employee responsible for controlling and accounting for the unused supply of fill slips, placing fill slips in the dispensers, and removing from the dispensers, each day, the triplicate copies remaining therein: Provided, That access will be permitted to an employee of the security department for the sole purpose of clearing any paper jams in the dispenser and if the accounting department does not work on weekends or federal or state holidays, they must complete these duties on the next day that they work.

### **Information to be recorded on fill slip.**

(6) On the original, duplicate, and triplicate copies of the fill slip, the preparer shall record, at a minimum, the following information:

- (a) The denomination of the gaming chips or coins being distributed;
- (b) The total amount of each denomination of gaming chips or coins being distributed;
- (c) The total amount of all denominations of gaming chips or coins being distributed;
- (d) The game and table number to which the gaming chips or coins are being distributed;
- (e) The date and shift during which the distribution of gaming chips or coins occurs; and
- (f) The signature of the preparer.

(7) Upon preparation, the time of preparation of the fill slip shall be recorded, at a minimum, on the original and the duplicate.

### **Employee verification.**

(8) All gaming chips or coins distributed to the gaming tables from the cashier's cage shall be transported directly by a security department employee. This employee shall verify the request for fill to the amount of the fill slip and sign the original of the request for fill, which is maintained at the cashier's cage, before transporting the gaming chips or coins and the original and duplicate of the fill slip for signature.

### **Signatures required on fill slips.**

(9) Signatures attesting to the accuracy of the information contained on the original and duplicate of the fill slips shall, at a minimum, be those of the following personnel at the following times:

- (a) The cashier upon preparation;
- (b) The security department employee transporting the gaming chips or coins to the gaming table upon receipt from the cashier of gaming chips or coins;
- (c) The dealer assigned to the gaming table upon receipt; and
- (d) The gaming operation supervisor assigned to the gaming table upon receipt of the gaming

chips or coins at such table.

### **Transporting chips and coins.**

(10) Upon meeting the signature requirements, the security department employee that transported the gaming chips or coins and the original and duplicate copies of the fill slip to the table, shall observe the following:

(a) The dealer shall immediately place the duplicate fill slip and duplicate request for fill in the drop box attached to the gaming table to which the gaming chips or coins were transported; and

(b) The security department employee shall then return the original fill slip to the cashier's cage where the original fill slip and request for fill shall be maintained together and controlled by cage employees.

### **VOID procedures.**

(11) The original and duplicate "VOID" fill slips, the original request for fill, and the original fill slip shall be forwarded as follows:

(a) The count team, as described in WAC 230-40-885(2), for agreement with the duplicate copy of the fill slip and duplicate copy of the request for fill removed from the drop box after which the original and duplicate copy of the request for fill and the original and duplicate copy of the fill slip shall be forwarded to the accounting department for agreement, on a daily basis, with the triplicate; or

(b) The accounting department for agreement, on a daily basis, with the duplicate fill slip and duplicate copy of the request for fill removed from the drop box and the triplicate. Provided, if the accounting department does not work on weekends or federal or state holidays, they must complete these duties on the next day that they work.

### **Transferring chips.**

(12) Transfers of gaming chips from one gaming table to another gaming table is prohibited. All transfers of gaming chips shall be to the cashier's cage.

## **Amendatory Section:**

### **WAC 230-40-870 Removing chips and coins from tables — Requests and credits — House-banking.**

All transfers of gaming chips and coins shall be closely controlled and documented in a manner that ensures accountability. Gaming chips and coins shall only be removed from gaming tables with adequate security. The following restrictions and procedures apply:

#### **Credit slip.**

(1) Each "credit slip" shall be serially prenumbered three-part forms, which provide an original and duplicate copies as necessary: Provided, That the director may authorize use of a computer based accounting system which includes a nonrepeating sequential numbering system that is consistent with the controls and safeguards of the manual system. Requests for credits shall be a two-part form which provides an original and duplicate copy. These forms shall be controlled in the following manner:

(a) Each series of credit slips received by a licensee shall be controlled and accounted for separately;

(b) Request for credits shall be secured in such a manner that only a gaming operations supervisor has access;

(c) Credit slips shall be secured by the cashier's cage;

(d) These forms shall be used in sequential order and all forms accounted for; and

(e) The preparer shall void forms that have errors by marking "VOID" on both the original and duplicate copies and sign the form.

#### **Request for credit.**

(2) A "request for credit" shall be prepared by the gaming operation supervisor to authorize the cage to prepare a credit slip for the removal of gaming chips and coins to the cashier's cage. The original and duplicate of the request for credit shall include the following entries:

(a) The date, time and shift of preparation;

(b) The denomination of gaming chips or coins to be removed from the gaming table;

(c) The total amount of each denomination of gaming chips or coins to be removed from the gaming table;

(d) The game and table number from which the gaming chips or coins are to be removed; and

(e) The signature of the gaming operation supervisor and dealer assigned to the gaming table from which gaming chips or coins are to be removed.

#### **Employee verification.**

(3) Immediately upon preparation of a request for credit and transfer of gaming chips or coins to a security department employee, a gaming operation supervisor shall obtain on the duplicate copy of the request for credit the signature of the security department member to whom the gaming chips and coins were transferred. The dealer shall place the duplicate copy in public view on the gaming table from which the gaming chips or coins were removed. Such request for credit shall not be removed until a credit slip is received from the cashier's cage at which time the request for credit and credit slip are deposited in the drop box.

### **Transporting requests.**

(4) The original of the request for credit and the gaming chips or coins removed from the gaming table shall be transported directly to the cashier's cage by the security department employee.

### **Credit slip procedures.**

(5) A credit slip shall be prepared by the cashier whenever gaming chips or coins are removed from the gaming tables to the cashier's cage. The following procedures and requirements shall be observed with regard to credit slips:

(a) Each series of credit slips shall be a three-part form and shall be inserted in a locked dispenser that will permit an individual slip in the series and its copies to be written upon simultaneously while still locked in the dispenser, and that will discharge the original and duplicate while the triplicate remains in a continuous, unbroken form in the dispenser: Provided, That if a computer system is used, which includes a nonrepeating sequential numbering system, the controls and safeguards of the manual system must be present; and

(b) Access to the triplicate copy shall be maintained and controlled at all times by an accounting department employee responsible for controlling and accounting for the unused supply of credit slips, placing credit slips in the dispensers, and removing from the dispensers, each day, the triplicates remaining therein: Provided, That access will be permitted to an employee of the security department for the sole purpose of clearing any paper jams in the dispenser and if the accounting department does not work on weekends or federal or state holidays, they must complete these duties on the next day that they work.

### **Information to be recorded on credit slip.**

(6) On the original, duplicate and triplicate copies of a credit slip, the preparer shall record, at a minimum, the following information:

(a) The denomination of the gaming chips or coins removed from the gaming table to the cashier's cage;

(b) The total amount of each denomination of gaming chips or coins removed from the gaming table to the cashier's cage;

(c) The total amount of all denominations of gaming chips or coins removed from the gaming table to the cashier's cage;

(d) The game and table number from which the gaming chips or coins were removed;

(e) The date and shift during which the removal of gaming chips or coins occurs; and

(f) The signature of the preparer.

(7) Upon preparation, the time of preparation of the credit slip shall be recorded, at a minimum, on the original and duplicate copy.

### **Signatures required on credit slips.**

(8) Signatures attesting to the accuracy of the information contained on the original and the duplicate copy of a credit slip shall be, at a minimum, the following personnel at the following times:

(a) The cage cashier upon preparation;

(b) The security department employee transporting the gaming chips or coins to the cashier's cage upon presentation to the cashier;

(c) The dealer assigned to the gaming table upon receipt at such table from the security department employee; and

(d) The gaming operation supervisor assigned to the gaming table upon receipt at such table.

### **Transporting chips and coins.**

(9) Upon meeting the signature requirements, the security department employee transporting the original and duplicate copies of the credit slip to the gaming table, shall observe the following:

(a) The dealer shall immediately place the duplicate copies of the credit slip and request for credit in the drop box attached to the gaming table from which the gaming chips or coins are removed; and

(b) The security department employee shall expeditiously return the original credit slip to the cashier's cage where the original of the credit slip and request for credit shall be maintained together and controlled by cage employees.

### **VOID procedures.**

(10) The original and duplicate copies of "VOID" credit slips, and the original request for credit and credit slip shall be forwarded to:

(a) The count team, as described in WAC 230-40-885(2), for agreement with the duplicate credit slip and the duplicate request for credit removed from the drop box, after which the request for credit and the original and duplicate credit slip shall be forwarded to the accounting department for agreement, on a daily basis, with the triplicate; or

(b) The accounting department for agreement, on a daily basis, with the duplicate copies of the credit slip and request for credit removed from the drop box and the triplicate, Provided, if the accounting department does not work on weekends or federal or state holidays, they must complete these duties on the next day that they work.

## **Amendatory Section:**

### **WAC 230-40-885 Count procedures — House-banking.**

Card rooms that offer house-banked card games shall ensure the contents of drop boxes are counted and recorded in a manner that ensures the proper accountability of all gaming chips, coins, and currency. The following restrictions and procedures apply:

#### **Notification of count.**

(1) The security department shall notify the surveillance department whenever the contents of drop boxes removed from gaming tables are to be counted and recorded, which, at a minimum, shall be once each gaming day.

#### **Count team members.**

(2) The opening, counting and recording of the contents of drop boxes shall be performed in the presence of and by those employees assigned by the gaming operation department for the conduct of the count. The count team must consist of three employees who shall not be in a position to perpetrate or conceal errors or irregularities in the normal course of his or her duties. Anyone both recording transactions and having access to the relevant assets is in a position to perpetrate errors or irregularities.

#### **Securing the count room.**

(3) Immediately prior to the opening of the drop boxes, the doors to the count room shall be securely locked and except as otherwise authorized, no person shall be permitted to enter or leave the count room, except during a normal work break or in an emergency, until the entire counting, recording, and verification process is completed.

#### **Video and audio recording of the count.**

(4) Immediately prior to the commencement of the count, one count team member shall notify the person assigned to the closed circuit television surveillance room in the establishment that the count is about to begin, after which such person shall make a video and audio recording of the entire counting process.

#### **Count procedures.**

(5) Contents of drop boxes shall not be mixed prior to counting and recording of each drop box. Procedures and requirements for conducting the count shall be the following:

(a) As each drop box is placed on the count table, one count team member shall announce, in a tone of voice to be heard by all persons present and to be recorded by the audio recording device, the game, table number, and shift marked thereon;

(b) The contents of each drop box shall be emptied and counted separately on the count table;

(c) Immediately after the contents of a drop box are emptied onto the count table, the inside of the drop box shall be held up to the full view of a closed circuit television camera, and shall be shown to at least one other count team member to confirm that all contents of the drop box have been removed, after which the drop box shall be locked and placed in the storage area for drop boxes;

(d) The contents of each drop box shall be segregated by a count team member into separate stacks on the count table by denominations of coin and currency and by type of form, record or document;

(e) Each denomination of coin and currency shall be counted separately, either manually or mechanically, by at least two count team members who shall place individual bills and coins of the same denomination on the count table in full view of the closed circuit television cameras, and such count shall be observed and the accuracy confirmed orally or in writing, by at least one other count team member;

(f) As the contents of each drop box is counted, one count team member shall record or verify on a master game report, by game, table number, and shift, the following information:

(i) The total amount of currency and coin counted, also known as the "drop";

(ii) The amount of the opener;

(iii) The amount of the closer;

(iv) The serial number and amount of each fill slip;

(v) The total amount of the fill;

(vi) The serial number and amount of each credit slip;

(vii) The total amount of all credit slips; and

(viii) The game win or loss.

(g) After the contents of each drop box have been counted and recorded, one member of the count team shall record by game and shift, on the master game report, the total amounts of currency and coin, table inventory slips, fill slips and credit slips counted, and win or loss, together with such additional information as may be required on the master game report by the licensee;

(h) Notwithstanding the requirements of (f) and (g) of this subsection, if the licensee's system of accounting and internal controls provides for the recording on the master game report of fill slips, credit slips, and table inventory slips by cage cashiers prior to the commencement of the count, a count team member shall compare the serial numbers and totals of the amounts recorded thereon to the fill slips, credit slips, and table inventory slips removed from the drop boxes: Provided, That the accounting department may complete the win/loss portions independently from the count team, if properly documented in the approved internal controls; and

(i) After completion and verification of the master game report, each count team member shall sign the report attesting to the accuracy of the information recorded thereon.

### **Concluding the count.**

(6) Procedures and requirements at the conclusion of the count for each gaming

shift shall be the following:

(a) All cash removed from each drop box after the initial count shall be presented in the count room by a count team member to a cashier who, prior to having access to the information recorded on the master game report and in the presence of the count team, shall recount, either manually or mechanically, the cash received;

(b) The top copy of the master game report, after signing, and the request for fills, the fill slips, the request for credits, the credit slips, and the table inventory slips removed from drop boxes, shall be transported directly to the accounting department and shall not be available to any cashier's cage personnel; and

(c) If the licensee's system of accounting and internal controls does not provide for the forwarding from the cashier's cage of the duplicate of the fill slips, credit slips, request for credits, request for fills, such documents recorded or to be recorded on the master game report shall be transported from the count room directly to the accounting department.

### **Accounting.**

(7) The originals and copies of the master game report, request for fills, fill slips, request for credits, credit slips and table inventory slips shall on a daily basis, in the accounting department be:

(a) Compared for agreement with each other, on a test basis, by persons with no recording responsibilities and, if applicable, to triplicates or stored data;

(b) Reviewed for the appropriate number and propriety of signatures on a test basis;

(c) Accounted for by series numbers, if applicable;

(d) Tested for proper calculation, summarization, and recording;

(e) Subsequently recorded; (~~and~~)

(f) Maintained and controlled by the accounting department; and

(g) Provided, if the accounting department does not work on weekends or federal or state holidays, they must complete these duties on the next day that they work.