

Downstream Authority of the Quapaw Tribe of Oklahoma Regular Meeting
July 6, 2011

Meeting Called to Order: 1:24 PM

ROLL CALL:	John Berrey, Chairman	Present
	Larry Ramsey, Secretary	Present
	Ranny McWatters, Treasurer	Present
	Marilyn Rogers, Member	Present
	Tamara Smiley, Member	Present

DECLARATION OF QUORUM: announced by Larry Ramsey
DCR: Steve Drewes/ Jani Cummings

General Manager Updates:

- DDA Deal Toys and Closing Dinner Dates
 - o Jefferies presented multiple options (see attached)
 - o Consensus of the DDA to go with the slot machine
- Tree Fund
 - o Recycle towels and donate to fund
 - o Get more details for review
- Tornado Relief Fund
 - o \$64,000 to date from Vendors
 - o Use to assist affected team members
- Deferred Comp Plan
 - o Have received one bid, \$250k per year
 - o IBC is also providing a couple of options for review
- Executive Severance Plan
 - o Add in In-house Counsel and Executive Office Manager
- Hotel
 - o New position to be added – Room inspector
 - 12 sups to be divided between room inspector and supervisor.
 - Consensus of the DDA to move forward
- Policies
 - o 1100.01.03 – Black Jack

Motion by DDA Secretary Larry Ramsey to approve the policy as presented. Seconded by DDA Treasurer Ranny McWatters. Vote: JB: yes; LR: Yes; RM: yes; MR: yes; TS: yes (5 yes, 0 no, 0 abstaining, 0 absent)
Motion Carries.

- o 1100.18.03 – Internal Controls for the Bad Beat Progressive and the Royal Flush Progressive Jackpot Promotion

Motion by DDA DDA Treasurer Ranny McWatters to approve the policy as presented. Seconded by DDA Member Marilyn Rogers. Vote: JB: yes; LR: Yes; RM: yes; MR: yes; TS: yes (5 yes, 0 no, 0 abstaining, 0 absent)
Motion Carries.

- o 1200.03.01 – EGM Tokes

Motion by DDA Member Marilyn Rogers to approve the policy as presented. Seconded by DDA Member Tamara Smiley. Vote: JB: yes; LR: Yes; RM: yes; MR: yes; TS: yes (5 yes, 0 no, 0 abstaining, 0 absent)
Motion Carries.

- o 1200.08.01 – Violation of Internal Controls

Motion by DDA Member Tamara Smiley to approve the policy as presented. Seconded by DDA Secretary Larry Ramsey. Vote: JB: yes; LR: Yes; RM: yes; MR: yes; TS: yes (5 yes, 0 no, 0 abstaining, 0 absent) Motion Carries.

- o 1200.10.01 – EGM Ticket Problems and Claims

Motion by DDA Secretary Larry Ramsey to approve the policy as presented. Seconded by DDA Treasurer Ranny McWatters. Vote: JB: yes; LR: Yes; RM: yes; MR: yes; TS: yes (5 yes, 0 no, 0 abstaining, 0 absent) Motion Carries.

- o 1400.37.01 – Verifying Return Cashier Banks

Motion by DDA DDA Treasurer Ranny McWatters to approve the policy as presented. Seconded by DDA Member Marilyn Rogers. Vote: JB: yes; LR: Yes; RM: yes; MR: yes; TS: yes (5 yes, 0 no, 0 abstaining, 0 absent) Motion Carries.

- o 1400.55.02 – Remote Deposits Checks

Motion by DDA Member Marilyn Rogers to approve the policy as presented. Seconded by DDA Member Tamara Smiley. Vote: JB: yes; LR: Yes; RM: yes; MR: yes; TS: yes (5 yes, 0 no, 0 abstaining, 0 absent) Motion Carries.

- o 6320.22.01 – Controlled Keys Procedure

Motion by DDA Member Tamara Smiley to approve the policy as presented. Seconded by DDA Secretary Larry Ramsey. Vote: JB: yes; LR: Yes; RM: yes; MR: yes; TS: yes (5 yes, 0 no, 0 abstaining, 0 absent) Motion Carries.

- o 6030.10.01 – Purchasing Policy

Motion by DDA Secretary Larry Ramsey to approve the policy as presented. Seconded by DDA Treasurer Ranny McWatters. Vote: JB: yes; LR: Yes; RM: yes; MR: yes; TS: yes (5 yes, 0 no, 0 abstaining, 0 absent) Motion Carries.

- Pole Banners

- o Two Options presented

- o DDA requested more options

- Add Quapaw language

- Tuition Reimbursement Program

- o Program presented for review (see attached)

- o Require they stay a minimum amount of time or have to repay DCR - 6 mo

Motion by DDA Member Marilyn Rogers to approve the Tuition Reimbursement Program. Seconded by DDA Member Tamara Smiley. Vote: JB: yes; LR: Yes; RM: yes; MR: yes; TS: yes (5 yes, 0 no, 0 abstaining, 0 absent) Motion Carries.

- Marketing

- o Billboard Options – Aug “Cash for Gas”

- DDA did not like any of the options, asked for “more mature” options

- o Mystery Play & Earn (August)

- Left over play & earn items

- 12 items

- 100 points to “pick” item

- o September

- Football Promo “Rushing for Riches”

- Play & Earn – Vases

- o Director Search
 - 15 resumes received
 - Will bring in the top 3 candidates to meet with the DDA.
- Sale & Banquets
 - o Restructure
 - Banquet supervisor
 - captains
 - Senior Sales Associate
 - 2 associates
 - o In-house detailer
 - o Incoming business
 - Less trade shows
- Learning Center
 - o OKDHS Child Care Provider Contract (see attached)
 - Review with JoQuita to see what OLC does
- Benefit Concert
 - o No information yet
 - o Seam is meeting today with James Garner
- Buffalo Grille Menu
 - o Review new proposed menu (see attached)
 - o \$5.85 each
 - o 10 day lead time
 - o Cover
 - Three options presented
 - Ribbon Work on top and bottom w/logo in the middle
 - o Goal to have the new menu in place by Aug 1
 - o Consensus of the DDA
- Red Oak Uniform Review
 - o Bartender – burgundy shirt and vest
 - o Server – black shirt and tie
 - o Back server/busser – brown shirt no tie

Donations:

- Apache Jingle Dress
 - o Pics attached , offer \$1000
- Dress was made by Polly Whitebird. - heaviest Elk Hides Picked by Tandy leather to start Mr Whitebird created the jingles out of Coffee cans Himself .Probably have \$1100-1200 in the construction, materials etc. in the Dress and am looking for a Fair offer.. Bruce Glenn
- State Superintendent's Conference Sponsorship - NO
- Liberty Bank of Arkansas Tennis Tournament donation - YES
 - o We would love for Downstream Casino to donate a package of 2 rooms for one night and dinner for 4 as one of our auction items.

Adjourn 4:01pm

DMG Team:

Meghan Brand
212-608-0196
ext# 7350



TEXT ON LASER CUT CARD

SCREENED PHOTO ON BACK

CLEAR LUCITE BLOCK

REAL CHIPS

BLACK PLEXI BASE

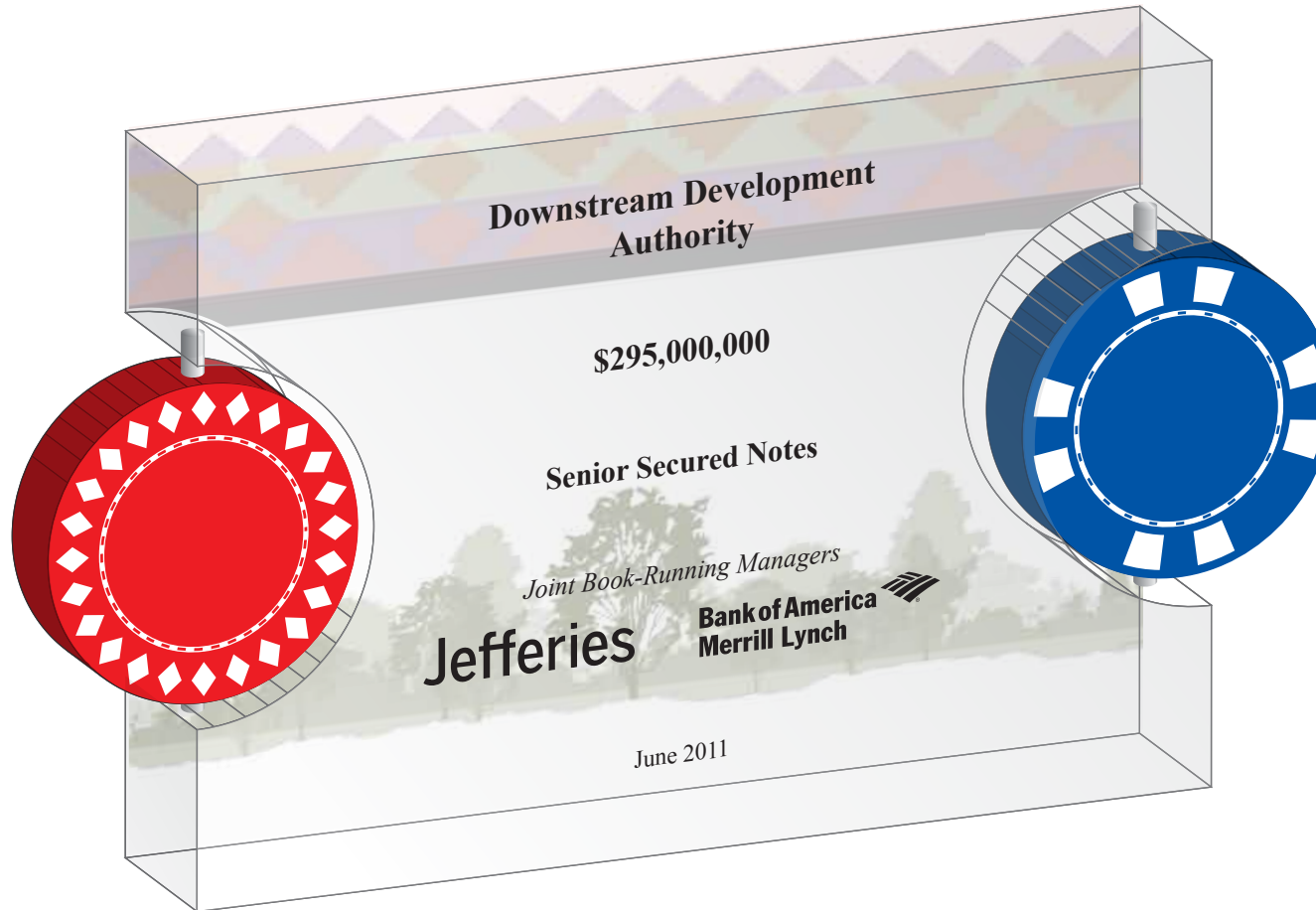


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DMG Team:
Meghan Brand
212-608-0196
ext# 7350

TEXT ON FRONT



CLIENT IMAGE ON BACK

SPINNING PLEXI
POKER CHIPS

CLEAR LUCITE



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DMG Team:

Meghan Brand
212-608-0196
ext# 7350



TEXT ON FRONT

CLEAR PLEXI

BLACKJACK TABLE ART ON
BROWN PLEXI BASE



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PROJECT NAME: 24943-DOWNSTREAM
DESIGN: 2
KARI JANSEN
646.845.8925

65% @ ACTUAL SIZE

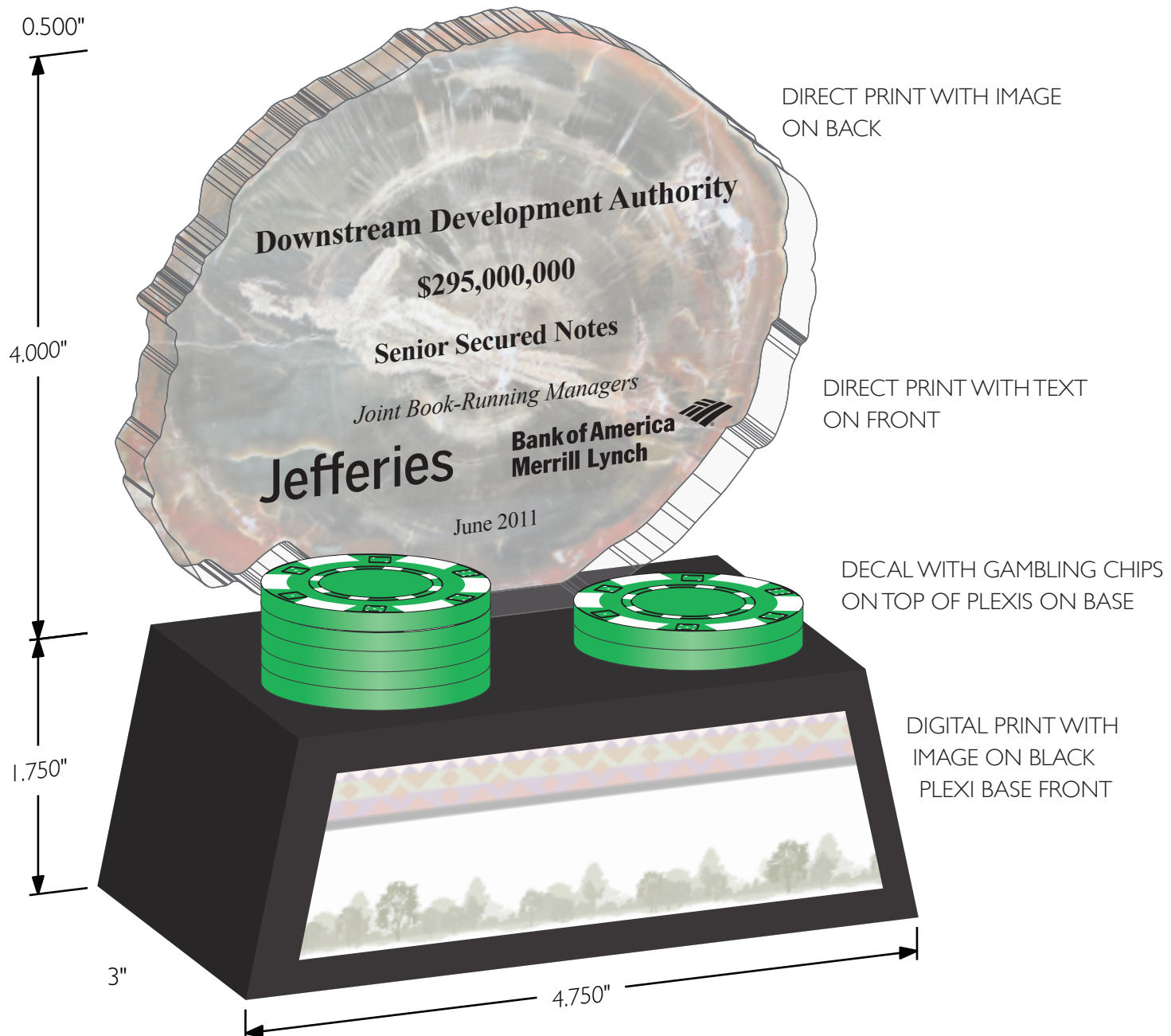


MINI SLOT MACHINE
(7.625" TALL X 4.25" WIDE X 4" DEEP)

TRANSFER PRINT WITH
TEXT AND IMAGE
ON FRONT

.5" BLACK
PLEXI BASE

PROJECT NAME: 24943-DOWNSTREAM
DESIGN: 1A
KARI JANSEN
646.845.8925



MM
06.30.11

Quapaw Tribal Gaming Agency



Date Received	4/18/11
Comments	
Reviewed By	JK 4/26/11 3m 5/5/11 MK 5/4/11 B 5/5/11
Approved	Tentative
Not Approved	Final

Policy and Procedure Submission

Policy Name and Number: Blackjack Policy #1100.01.03	Department: Table Games	Submission Date: 4/26/2011
Narrative Description: To establish a policy and procedures for Blackjack. This is a revision to #1100.01.02 to change a few line items in the Tokes section of the policy.		DCR/QTGA Tracking: POLICIES & PROCEDURES DDA APPROVED JUL 06 2011

DCR Compliance Authorization

Signature: Stephani B. A. 2551

Date: 4/15/11

Department Director Authorization

Signature: [Signature] 563

Date: 4/13/11

General Manager Authorization

Signature: [Signature]

Date: 4/18/11

QTGA Authorization

Signature: Barbara Cellini

Date: 5/16/11

Blackjack	Policy No: 1100.01.03	Issue Date: 5/16/2011
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PURPOSE: Establish Blackjack procedures

DCR Compliance – ITEM Tracking	Date
Issue Date	5/16/2011
Compliance Review	3/2/2010
QTGA Submission	3/4/2010
QTGA Final Approval	3/11/2010
GM Approval	3/4/2010
DDA Final Approval	3/31/2010
Compliance Revisions to 1100.01.02	4/15/2011
QTGA Submission	4/26/2011
QTGA Final Approval	5/16/2011
GM Approval	4/18/2011
DDA Final Approval	7/6/2011

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OPENING TABLE PROCEDURE

OPENING THE TABLE

1. After the Dealer arrives on their assigned game, the Pit Manager will retrieve the Lid Key and Shoe Box Key from the Pit Manager podium. The Pit Manager will unlock both the rack lid and the shoe box for the unopened game.
2. The Floor Supervisor or above will instruct the Dealer to pull the lid up from the chip rack. The Dealer will place the lid in the holder under the game.
3. The Floor Supervisor or above will take the opening count sheet from the tray and along with the Dealer verify that the number of chips in the rack match what is on the opening slip.
4. When both the Floor Supervisor or above and Dealer are satisfied that the count matches they will both sign the opening slip with their name and badge number and the Dealer will drop the slip into the drop box. If the opening slip does not match the table rack the Floor Supervisor or above will inform the Pit Manager.

CLOSING THE TABLE

1. After management makes a decision that a game is no longer needed for business purposes the Pit Manager will inform the Dealer to “bring up their lid”. The Dealer then will retrieve the lid from underneath the table and place it in the middle of the table. The Dealer will drop in the drop box any ante amounts collected that are still in the rack.
2. The Floor Supervisor or above and Dealer will prepare a closing slip by counting all the chips in the table. The Floor Supervisor or above will mark on the closing slip the value amount of each denomination of chips. The Floor Supervisor or above and the Dealer then will sign the closing slip with name and badge number. Once the closing slip is complete a Pit Manager will verify the closing slip to the table chip tray.
3. The Pit Manager will top sign the closing slip by placing his initials and badge number on the slip.
4. The Dealer will drop one copy of the closing slip into the drop box and a second copy will be placed into the chip tray.

OPENING SHUFFLE AND WASH

1. The Dealer and Floor Supervisor or above will visually inspect all the cards front and back and then the Dealer will begin the opening shuffle in according to the following procedure:
 - a. The Dealer must announce "**SHUFFLE**" in a loud and clear voice and wait for acknowledgement from a Floor Supervisor or above **before** proceeding.
 - b. A Floor Supervisor or above will authorize the Dealer to begin by repeating "**SHUFFLE.**" If possible, that Floor Supervisor or above should observe the Dealer's shuffle in its entirety.
 - c. The Dealer will pick up each deck individually and place that deck **face down** in the center of the layout. The Dealer will then divide the deck in half and riffle once and place that just riffled deck in the discard holder **face down**. The Dealer will place each deck perpendicular to the one before it in a criss-cross pattern. This process will continue until all decks have been riffled and placed in the discard rack.
 - d. The Dealer will then remove four decks from the discard holder and spread each one face down in four horizontal fan-shaped columns and mix them thoroughly by "washing" the cards to ensure a good mix. The Dealer will re-stack those "washed" cards and place them on the Dealer's right between the drop slot and the discard rack.
 - e. The Dealer will repeat the process with the four remaining decks. However, the Dealer will now place the first four decks which have already been washed in the discard rack before he begins the wash on the four remaining decks.
 - f. The Dealer will return all cards to the discard rack once the full wash (all decks) has been completed. The Dealer will now be ready to begin the regular shuffle.
 - g. The Dealer now will shuffle the cards according to the house shuffle.
 - h. Once all cards have been shuffled they will be placed in the discard rack ready for play.

DEAD GAME

1. On open tables which have gone dead, the Dealer will leave the cards in the shoe and wait until another player arrives at the table
2. When play resumes on the table, the Dealer will burn a card and continue to deal from the shoe.

OPENING SHUFFLE AND WASH-AUTOMATED SHUFFLER

1. The Dealer and Floor Supervisor or above will visually inspect all the cards front and back and then the Dealer will begin the opening shuffle in according to the following procedure:
 - a. When using an automatic shuffle machine, two (2) different sets of colored cards will be used. One set of the same colored cards can be shuffled while the other colored set of cards can be dealt and played. Both colors are continually alternated in and out of play, with each color being used for every other round of play. Only one color will be placed in the discard rack at any given time.
 - b. The 8 decks of the first color will be inspected and placed face up in a criss-cross pattern into the discard rack. The 8 decks of the second color will be inspected and spread face up on the table layout. The Dealer will begin the opening shuffle in according to the following procedure:
 - c. The Dealer must announce "SHUFFLE" in a loud and clear voice and wait for acknowledgment from a Floor Supervisor or above before proceeding.
 - d. A Floor Supervisor or above will authorize the Dealer to begin by repeating "SHUFFLE".
 - e. The Dealer will spread deck individually and place it face down in the center of the table.
 - f. The Dealer will divide the deck in half, riffle once, and place the riffled deck near the left edge of the float tray; between the Dealer and the dealing shoe. This process will continue until all 8 decks have been riffled and stacked.
 - g. The Dealer will then take approximately 4 decks, spread them face down horizontally on the layout; and mix them thoroughly by "washing" the cards to ensure a good mix.

- h. The Dealer will re-stack the washed cards and place them on the Dealer's right in front of the drop slot. The Dealer will repeat the process with the remaining 4 decks and re-stack them into the middle of the layout.
 - i. The first 4 decks to be washed will be brought from the area in front of the drop slot and placed on top of the other 4 decks.
 - j. All 8 decks will now be placed into the automated shuffler.
2. The same process will be followed for the 8 decks of the previous color for wash and shuffle. Once the automated shuffler has completed shuffling the first 8 decks; the Dealer will place the remaining 8 decks into the shuffler. The Dealer will remove the shuffled decks from the automated shuffler and place the 2nd cut card on the bottom of the decks. At this time the Dealer will offer the cards to a player for the cut. When sending out the cards for the cut, be sure to have the front of the cards facing the player that's cutting. A player must cut at least ONE deck from either end to complete the cut. After the cards have been cut, the Dealer shall bring the decks to the center of the layout. Take the cards including the cut card, and place them to the back of the stack, after which the Dealer shall insert the 2nd cut card. If the cut does not meet the one deck minimum, the cut card should be removed and offered again for a re-cut. THE DEALER MUST MAINTAIN PHYSICAL AND VISUAL CONTACT WITH THE DECK AT ALL TIMES WHILE THE CARDS ARE OUT OF THE SHOE.

CONTINUATION SHUFFLE WITH A SHUFFLE MACHINE

1. After the cut card is out, and round of play is over; the Dealer will announce **"SHUFFLE" (not "shuffle UP")** in a loud and clear voice and wait for acknowledgement from a Floor Supervisor or above before proceeding and prior to removing any card from the discard holder or shoe. The Dealer must wait for approval from a Floor Supervisor or above (Supervisor will repeat "Shuffle") **before** the shuffle begins. A Floor Supervisor or above **MUST** observe the removal of cards from the shoe to the discard rack and the commencement of the shuffle. Take the remaining cards from the shoe and plug these cards into the lower, middle and upper portions of the discard rack 1/3rd at a time. At this time place the cards into the shuffle master; remove the shuffled decks; present for the cut and play will commence.

DEAD GAME-AUTOMATED SHUFFLER

1. On an open table with an automated shuffler which has become void of Players; the Dealer will remove the cards from the shoe and discard rack and spread them face down.

2. When play resumes on the table, the Dealer will announce "shuffle" in a loud and clear voice and wait for acknowledgement from a Floor Supervisor or above before proceeding.
3. The Dealer will take the spread decks stack and place them into the automated shuffler. The Dealer will then remove the shuffled decks, present for the cut and play will commence.

REGULAR SHUFFLE PROCEDURE

1. The Dealer must shuffle:
 - a. When a **new set of decks** are entered into play (opening procedures apply.)
 - b. When the **cut card appears** during the course of play, and that round of play has been completed.
 - c. When the **cards have been spread**, and that game is about to resume.
 - d. Whenever a **deck has been dropped** or otherwise mishandled.
 - e. Whenever **instructed to do so by a Floor Supervisor or above**. (The Dealer will never shuffle at the request of a Player without the approval of a Floor Supervisor or above.)
2. The Dealer will announce "**SHUFFLE**" (not "**shuffle UP**") in a loud and clear voice and wait for acknowledgement from a Floor Supervisor or above before proceeding and prior to removing any card from the discard holder or shoe.
3. The Dealer must wait for approval from a Floor Supervisor or above (Supervisor will repeat "Shuffle") **before** he begins the shuffle. A Floor Supervisor or above **MUST** observe the removal of cards from the shoe to the discard rack and the commencement of the shuffle.
4. A Floor Supervisor or above should observe the Dealer's shuffle in its entirety if at all possible.
5. The Dealer will move the shoe slightly forward, toward the center of the table, to the corner of rack. The Dealer will remove any remaining cards from the shoe with his right hand and place them in the discard holder.
6. The Dealer must ensure that all cards are removed from the shoe.

7. The Dealer will place the roller on the layout against the front right-hand side of the shoe.
8. The Dealer must check for any overage or shortage of cards after all cards have been placed in the discard rack. The Dealer must notify a Floor Supervisor or above if it appears as though any cards are missing.
9. The Dealer will then remove all cards from the discard rack and place them in the center of the table. The cards will be divided in half then the left pile will be rotated 180 degrees.
10. The Dealer will take three quarters of a deck with the left hand and take three quarters of a deck with the right hand from both stacks and riffle twice. The cards will then be placed directly in the center on the insurance line.
11. The Dealer will then take three quarters of a deck from the left stack and three quarters from the newly created center stack and riffle twice placing the newly riffled cards on the center stack.
12. The Dealer will then take approximately three quarters of a deck from the center stack and three quarters of a deck from the right stack and riffle twice placing the riffled cards on the center stack.
13. Repeat this step alternating the left and right stack with the center stack until all cards have been shuffled.
14. The Dealer will remove the yellow card from under the lip of the shoe and place it on the layout in the center of the table.
15. The Dealer will now divide the newly created stack into two equal stacks and place one stack to the right and one stack to the left just inside the insurance line.
16. The Dealer will then take approximately three quarters of a deck from the right stack and three quarters of a deck from the left stack and lace the cards. The Dealer will then place the laced cards on top of the yellow "protection" card in the center of the table and repeat the process until all cards have been laced.
17. The Dealer will now call out for "Shuffle Check" and wait for approval from a Floor Supervisor or above. Floor Supervisors or above should check the lace prior to giving approval.
18. The Dealer will now offer the cards to be "Cut."

19. Note: The Dealer must not change any aspect of the shuffle procedure unless instructed to do so by the Pit Manager or a Casino Manager.

CUTTING THE DECK

1. The Dealer, upon completion of the shuffle, will offer a Player the stack of cards with the bottom card covered by the yellow "protection" card. The backs of the cards must face the Player with the protection card facing the Dealer.
2. The Dealer will offer the "Cut" of the cards to:
 - a. The first Player who arrives at the table if the game is just beginning.
 - b. The Player on whose hand the cut card appeared during the last round of play.
 - c. The Player at the farthest point to the right of the Dealer if the cut card appeared on the Dealer's hand during the last round of play or if the shuffle was initiated by the Pit Manager.
 - d. The Player at the farthest point to the left of the Dealer if the cut card appeared in the shoe as the first card of a new round of play.
3. The Dealer will offer the opportunity to cut the cards to each Player, moving clockwise around the table until a Player accepts the cut only if the Player designated to cut the cards refuses.
4. The Dealer must notify a Floor Supervisor or above if each Player refuses to cut the cards. In that event the Dealer must cut the cards. A Floor Supervisor or above may NEVER cut the cards.
5. The Player must cut the cards by placing the cut card in the stack at least one deck from either end. However, a Pit Manager may instruct the Dealer to cut the deck more or less.
6. The Dealer must ensure the cards be cut only once. (If the cut does not meet the one deck minimum, the cut card must be removed and offered again for a re-cut.)
7. THE DEALER MUST MAINTAIN PHYSICAL AND VISUAL CONTACT WITH ALL CARDS AT ALL TIMES WHILE THE CARDS ARE OUT OF THE SHOE.
8. The Dealer, once the cut card has been inserted by the Player, will bring the cards to the center of the layout. The Dealer will then take all of the cards in front of and including the cut card, and place them to the rear of the stack.

9. The Dealer will bring the shoe to the center of the layout.
10. The Dealer will then remove the yellow "protection" card from the stack. Holding the full stack of cards with the left hand against and to the back of the side of the shoe, the Dealer will insert the yellow card with his right hand and cut approximately two decks (unless instructed otherwise by a Floor Supervisor or above). The Dealer will then place the stack of cards in the shoe for the commencement of play.

"BURNING" A CARD

1. The Dealer will "burn" the first card from the shoe by placing that card face down into the discard holder.
2. The Dealer will not reveal the "burn" card unless a Player requests to see it.
3. The Dealer will "burn" a card when:
 - a. He completes a shuffle
 - b. A new Dealer taps onto the game.
4. If the Dealer "burns" two cards or does not "burn" the first card when he completes the shuffle, or if the new Dealer fails to "burn" a card after tapping onto a game, THE DEALER WILL CONTINUE TO DEAL NORMALLY. The Dealer will notify a Floor Supervisor or above if a dispute arises.

GAME SECURITY AND PROTECTION

1. The Dealer must be cognizant of and ultimately responsible for all situations concerning his game. There is no procedure for acquiring the ability to "read" the Player(s). Each Dealer should continually fine tune this skill.
2. The Dealer must always clear his hands, palms up, whenever the Dealer's hands leave the surface area of the table.
3. The Dealer must politely inform Players that items such as purses, eye glasses, wallets, etc. are not permitted on the table. Players are permitted, however, to keep their beverage glasses and cigarettes on the table. As the discard rack is very vulnerable, the Dealer must be aware of any unusual motion around or near the discard rack, and as such must not allow any Player to keep stacks of cheques or any other items next to the discard rack.

4. The Dealer, for his own protection, should not permit friends and/or relatives to play at his table. The Dealer must inform a Floor Supervisor or above of any Player who is a friend or relative.
5. The Dealer must not be distracted by loud noises or arguments in other areas of the Casino. This applies to both "live" and "dead" games.
6. The Dealer will stand squarely up to the table at all times and avoid leaning on the table.
7. The Dealer must watch the game at all times and be aware of any unusual movements or errors made by any Player.
8. The Dealer will notify a Floor Supervisor or above of any Player who makes suspicious moves or causes any problems for other Players.
9. The Dealer's left hand must always be on the shoe whenever the shoe contains cards EXCEPT:
 - a. When shuffling;
 - b. When making change;
 - c. When taking and/or paying; and
 - d. When counting the bankroll.
10. The Dealer will place his fingers over the semicircular window in the shoe to protect against unnecessary exposure of the next card to come from the shoe.
11. The Dealer must continually be aware of the condition of the cards and must notify a Floor Supervisor or above of any unusual markings or defects.
12. The Dealer must watch closely any Player attempting to place his hand(s) over the bet(s) or the cards. The Dealer must ensure that Players' betting bankrolls are against the rail away from the betting circle.
13. The Dealer will bring the shoe toward the middle of the table and turn it towards the rack when making all transactions and when counting the bankroll.
14. The Dealer will scan the layout and check the amount of each bet in the betting area before beginning each round of play paying particular attention to the first and seventh spots (1st Base and 3rd Base). The Dealer must ensure there are no Barber Pole bets: bets that are

above or below the table limits, bets that are not in a single stack and bets which are not within the betting circle and make any corrections necessary.

15. The Dealer, when dealing to the first spot, must side-step to his left and turn slightly to the right to ensure a good view of the rest of the game and third base in particular. First and Second spots must be hit with the Left Hand. When dealing to the third spot and onward, the Dealer must take a step to the right so that he is standing at the middle of the table. This process is known as "Walking the Game." The Dealer will avoid unnecessary turning which may blind him to first and seventh spots.
16. The Dealer must be aware of all bets wagered and must pay particular attention to those bets wagered on the 1st and 7th betting areas. Pinchers and Cappers will most likely take advantage of betting spots one (1) and seven (7).
17. The Dealer must not touch the cards, the bankroll or any equipment on a "dead game" unless instructed to do so by a Floor Supervisor or above or Pit Manager.
18. The Dealer must receive verbal approval from a Floor Supervisor or above before bringing in cheques for color change.
19. The Dealer will place excess plastic spacers on top of the largest denomination of cheques in the rack if those cheques are not in use.

PROCEDURES FOR DEALING THE CARDS

DELIVERY OF THE CARDS

1. The Dealer must announce, "ALL BETS DOWN, PLEASE" before delivering any cards.
2. The Dealer will scan the layout to ensure that all bets are properly placed and that no player has bet over the table maximum or below the table minimum. Furthermore, the Dealer must ensure that:
 - a. All bets are within the designated betting area.
 - b. All bets consist of gaming cheques; cash may not be wagered.
 - c. There are no **Barber Pole** bets. The Dealers must stack a Player's bet with the highest denomination cheques on the bottom and the lowest on the top.
 - d. No Player will alter an original wager or place a new wager once the first card is dealt.

3. The Dealer must announce "NO MORE BETS" **before** each round of play.
4. The Dealer will count the number of bets placed in the circles. Each bet will be considered a hand played for the upcoming round. The Dealer will then multiply the number of hands that will be played by the ante amount designated by the Authority.
5. The Dealer will take out of the rack the appropriate amount of cheques to satisfy the ante amount above. The Dealer will then place these checks into the left most tube of the chip tray. Once the ante amounts equal \$25 or more in the left most chip tray, the Dealer will announce "**CHANGE ANTE**" in a clear and loud voice. The Dealer will take the chips from the ante tube and place and run down the cheques in front of the chip tray. The Dealer will then take out one \$25 chip from the chip tray and place the chip in front of the chip tray to the right side of the chips that made up the ante amount. The Dealer will drop the \$25 chip into the drop box and then place the ante amount of chips back into the chip tray accordingly. The only cheques allowed to be dropped into the drop box will be for accumulated antes.
6. The Dealer will deal all cards from a dealing shoe located on the table to the Dealer's left.
7. The Dealer must remove cards from the shoe with the **left hand**, and then place them with the right hand, face up, directly in front of each betting area that has a wager beginning with the betting area to the Dealer's left (1st Base) and continuing clock-wise.
 - a. The Dealer must not allow a Player to touch the cards.
 - b. The Dealer must use his left hand to deal any "hit" cards to the first two betting spots.
8. The Dealer **must take a step to the left** when hitting the first two spots, then turn lightly to the right to ensure a clear view of the entire table. The Dealer will move to the center of the table and place his body squarely to it when dealing to all other spots. This process is known as "WALKING THE GAME" and is absolutely necessary to protect the security and integrity of the game.
9. The Dealer **must keep his left hand on the shoe at all times** with his fingers covering the window, unless the Dealer is making change, paying and taking the first two spots, etc. This is also necessary to protect the security and integrity of the game.

CARD PLACEMENT

1. The Dealer, when delivering cards to the Players, must place those cards directly in front and to the center of each designated area containing a wager. The Dealer may deal the cards for the first and second spots, slightly higher and closer to the Player and to the right of the Player's bet. These cards should not touch the Player's bet or any part of the second betting area.
2. The Dealer must deal the second and all subsequent cards so that they cover the left bottom quarter of the previous card ensuring visibility of the center spot(s) of each card (see diagram).
3. The Dealer must ensure proper card placement as a Floor Supervisor or above or Pit Manager and Surveillance must be able to read point totals at a distance from the table, reading spots rather than numbers.

THE DEALER'S "HOLE CARD"

1. The Dealer will deal one card **face up** to each Player who has wagered a bet and one card face up to himself.
2. The Dealer will then deal a second card **face up** to each Player.
3. The Dealer will then deal a second card **face down** to himself placing it underneath his first card. This card is known as the **Hole Card**. No part of the "hole card" should be visible.
4. The Dealer must take care not to expose the "hole card" when placing it under the face up card.
5. Once each patron and the Dealer has received 2 cards, the Dealer will act upon each 3 card wager from right to left, before continuing with the Blackjack game portion. If the side wager loses, the Dealer will collect the bet and place it in the rack. If the patron has a winning qualifying hand, the Dealer will immediately pay the wager according to the pay table posted on the layout. Once a decision on all 21 Plus 3 wagers has been accomplished, then the game resumes as a standard Blackjack game. (See "21 + 3 Procedure Manual" on pg. 36)

THE PLAYER'S HAND SIGNAL

1. The Dealer, having dealt two cards to each Player and himself, will begin from the left and announce the point total of each Player's hand.
2. The Dealer must wait for the Player to make a **definitive hand signal** indicating what action he is taking on that hand. The exceptions are a Blackjack or a hand with a point total of "21" in which case the Player may not take any further action on that hand.
3. The Player who wants an additional card must make a **clear and visible scratching** or tapping motion on the layout behind his bet.
4. The Player who does not want any additional cards must indicate that by making a **clear horizontal wave** from side to side (slicing) over the layout behind his bet. Players should not make a hand signal over their bet.
5. The Dealer **must not** anticipate a hit for a Player and must wait for an actual hand signal **before** removing any card from the shoe.
6. The Dealer **must** receive a hand signal "to stand" before proceeding to the next hand.
7. The Dealer will deal any additional cards **face up** and announce the point total after he deals each card.
8. **NOTE: The Dealer will avoid many potential problems by ensuring that all hand signals are clear and taking nothing for granted. The Dealer should politely instruct a Player of proper hand signals if that Player is unaware or unsure of them.**

HITTING THE DEALER'S HAND

1. The Dealer will expose the hole card and announce his two card total **only after** the Dealer has acted on all Players' hands.
2. The Dealer will hit his hand starting to the right of the exposed cards leaving a small space between the cards. The Dealer must hit his hand if that hand is soft 17 or 16 or less and always stands on hard 17.
 - a. EXAMPLE: ACE + 6 is "7"
 - b. It is not "7 or 17" and the Dealer **must** hit.
 - c. ACE + 5 is "6 or 16" and the Dealer **must** hit.

3. The Dealer must announce the point total as each card is drawn. The Dealer must also announce the final point total before acting on any hands. If the point total is over "21", the Dealer will announce "DEALER BREAKS" instead of the point total.
4. The Dealer must ensure that the Players' cards and the Dealer's cards not merge into each other. If necessary, the Dealer will reposition a Player's cards by moving them to the right side of the betting circle.
5. The Dealer must notify a Floor Supervisor or above if the Dealer mistakenly hits his hand of "17" or more.
6. The Dealer must not hit his hand if all Players' hands have broken or are Blackjacks. If the Dealer's hand does not affect the outcome of the round of play, it is not completed.
7. EXAMPLE: Three Players are at the table and the Dealer has a six showing. One Player has a Blackjack; he is paid immediately. The other two Players break. The outcome of each hand is not affected by the Dealer's cards. Therefore, the Dealer will draw no additional cards.

CALLING THE GAME

1. The Dealer, starting with the **first hand on the left**, will announce the point total of the first two cards while pointing to that specific hand.
2. The Dealer will **not** touch the cards when indicating each Player's turn.
3. The Dealer, after announcing a Player's point total, must wait for that Player to indicate, with a proper hand signal, what action he desires. If that Player wants an additional card, he must tap or scratch the table. If he does not want an additional card, he must make a horizontal (slicing) hand motion. **Players must not touch their cards for any reason.**
4. The Dealer **must announce a hand** containing an Ace as both a **soft total** and as a **hard total** since the Ace may count as a One or as an Eleven.
5. EXAMPLE: The hand consists of an Ace and a five; the Dealer will announce the total as : " 6 or 16 "
6. The Dealer will continue to announce the point total of each hand as he deals each additional card until the Player's hand breaks (exceeds 21) or until that Player waves off any additional cards and stands.
7. The Dealer must announce Blackjacks as he deals them.

8. The Dealer will reveal his hole card by turning it **face up** and announce the point total **only after** all Players' hands have been played. The Dealer will then take any additional cards as required (must hit on "16" and stand on "17 ") while announcing each new total.
9. The Dealer must announce "DEALER BREAKS" and will not announce the point total if the Dealer's hand breaks.

PLAYER BREAKS

1. The Dealer will clearly announce "PLAYER BREAKS" when a Player takes an additional card which increases the total of the hand to more than "21."
2. The Dealer will collect the losing wager first and then remove the cards and place them in the discard rack.
3. The Dealer will leave a Player's hand spread on the layout while the Dealer collects the losing bet. This gives the Player the opportunity to add the cards and verify the total before the Dealer collects the cards. It is a patron courtesy as most Players will not add their cards as fast as the Dealer.

CLEARING THE LAYOUT

1. The Dealer, at the conclusion of each round of play, will remove in order any cards still remaining on the layout beginning with the seventh spot (or the hand farthest to the Dealer's right) and continuing counter-clockwise (right to left). The Dealer will scoop the cards so that each hand is placed underneath the next hand. The hand that is being scooped will now be face up on top of the cards already in the Dealer's hand. The Dealer should attempt to use only one hand to scoop the cards ensuring that the view of the layout not be blocked.
2. The Dealer will remove his own hand after all Players' hands have been removed.
3. Only a Floor Supervisor or above will "back up" or "re-enact" a hand. The Dealer must remove the cards in proper order to ensure Game Security and good Player relations. A Player may have questions about his hand or the Dealer's hand, and the Floor Supervisor or above must be able to reconstruct the entire hand and rectify any mistakes.

WAGERING

1. All wagers in Blackjack must be made by placing gaming cheques within the center of the betting circle on the Blackjack layout not touching the outside edges.
2. The Dealers must not accept verbal wagers.
3. Once the Dealer delivers the first card of any hand, a Player may not handle, remove or alter any wager which has been made until after that hand has been completed.
4. The Gaming Operation may allow a player to play up to three hands at the discretion of Casino Management and Casino Management may require the player to reduce to one hand during busy levels.
5. Casino Management may, by prior arrangement, allow a patron to play more than three hands.

PLACEMENT OF WAGERS

1. PLAYER BETS

- a. All Player bets must be placed within the betting circle. Any cheques outside or between the designated circles will be considered NO BET.

2. DOUBLE DOWN BETS

- a. All Double Down bets must be placed on the Dealer's right (Player's left) next to the original bet. The Double Down bet will bisect the betting circle while the original bet remains in the center of the circle.

3. SPLITTING PAIRS BETS

- a. All Split Pairs bets must be placed so that they bisect the left and right side of the betting circle, and any amount Doubled Down must be placed to the right of the split amount. The original bet moves to the left side and the split wager will be placed on the right side.

4. INSURANCE BETS

- a. All Insurance bets must be placed on the insurance line to the Dealer's right (Player's left) of that Player's betting circle. If a Player wishes to insure a Token bet, the insurance must be placed with that Player's insurance bet.

TAKING AND PAYING

1. The Dealer begins taking and paying **only after** the Dealer's hand is complete. The Dealer will begin with the Player's hand on the Dealer's right and act on all hands in order, progressing counter-clockwise around the table.
2. The Dealer must take and pay wagers on 7 through 4 betting circles with his **right** hand. The third circle is optional (**right or left**). The Dealer will take and pay wagers on the first two betting circles with his **left** hand.
3. The Dealer will unstack multi-color bets with the highest denomination in front towards the Dealer and the lowest in the back. The Dealer will pay multi-color bets from back to front.
4. The Dealer will size into the cheques when paying a wager. The Dealer must not drop, lay, slide, or throw cheques.
5. The Dealer must not use stacks of cheques with varied denominations (a "Barber Pole") when paying wagers. A Barber Pole payoff **is acceptable only** if it is to pay a Blackjack wager consisting of multi-color cheques as that wager is paid color for color.
6. The Dealer must not leave a partial payoff with a Player's wager. The Dealer must bring the partial payment back to the rack, and return with sufficient cheques to make the total, correct payoff.
7. The Dealer must indicate a push by clearly patting or tapping the table twice with an empty hand palm up next to the wager. The Dealer must also verbalize by announcing "Push."
8. The Dealer must act on separate hands and split hands individually. The Dealer must not pay several wagers of varying denominations by stacking payoffs in order and sizing into the winning wagers - "Barber Pole" payoffs are not acceptable.
9. The Dealer will pay a winning wager with stacks whenever possible, (Example: \$75 in \$5 cheques - the Dealer will break down the \$75 into three stacks of \$25 each and pay with one stack of three \$25 cheques.) The Dealer must "cut down" horizontally a winning wager which requires breaking down and pay that wager with one stack of cheques placing it offset in front and to the side of the broken down wager.
10. The Dealer will place all payoffs within the betting area next to the winning wager. Multi-colored bets must be broken down with the largest denomination of cheques in front (toward the Dealer) and the lowest denomination of cheques in back.

DEALER RELIEF PROCEDURES

1. The **relief** Dealer will tap onto a game from behind and to the left of the **outgoing** Dealer. The **outgoing** Dealer will leave the table to the right.
2. The Dealer must continue to deal until the **relief** Dealer is physically at the table.
3. The **relief** Dealer must tap the **outgoing** Dealer on the shoulder to let him know that he is there. The **relief** Dealer will stand behind the **outgoing** Dealer while waiting to tap onto the game. The **relief** Dealer must not stand beside the **outgoing** Dealer and/or lean on the table or talk while a hand is in play.
4. The Dealer must not leave a game until **all** work has been completed for that round. When a **relief** Dealer taps a Dealer who is in the middle of a shuffle, that Dealer must complete the **entire** shuffle before leaving the table. The **relief** Dealer will burn a card.
5. The **outgoing** Dealer will inform the **relief** Dealer if the cut card is out and which Player is designated to cut the cards.
6. The **outgoing** Dealer, when leaving a table, will place the shoe in the center of the table pointing towards the right, draw a single card face down approximately 4" – 6" from the lip of the shoe, clear his hands, and leave to the right.
7. The **relief** Dealer must take responsibility for knowing minimum and maximum limits on the game. However, the **outgoing** Dealer should inform the **relief** Dealer of any changes that have taken place since he was last there i.e, "This is now a \$15 table not \$10".
8. The Dealer must notify a Floor Supervisor or above immediately (**before** leaving a Pit area) if that Dealer receives a break after less than sixty (60) minutes as an error may have occurred with the relief procedure.

PACING THE GAME

1. A Dealer's proficiency and skill are often determined by that Dealer's ability to "Pace the Game."
2. The Dealer should keep the game at a fast even tempo ensuring Players enough time to place their bets.
3. The Dealer will politely encourage new or slower Players to play at a normal rate. The Dealer should discreetly notify a Floor Supervisor or above of a Player who might be intoxicated and deliberately slowing the game.

4. The Dealer must not allow Players set the pace of the game. The Dealer must take charge of the game and set the pace always doing so in a polite and courteous manner.
5. The Dealer should be as courteous as possible while instructing new Players on the procedures and rules of Blackjack.
6. The Dealer must avoid instructing a Player how to play his individual hands (even when asked to do so by that Player).

DOUBLING DOWN

1. A Player may double down with any two cards **with the exception of a Blackjack. Blackjack is an Ace and ten value card as first 2 cards dealt to a position.**
 - a. A Player may double down for any amount up to the amount of his original wager.
 - b. A Player will place the double down wager directly next to and on the Dealer's right of that Player's original wager. The double down wager should bisect the betting circle.
 - c. A Player will receive only one additional card.
 - d. The Dealer will place the double down card face up or down depending on the house particular game that is being played.
2. The Dealer must ask a Player before delivering any card whether that Player is "Splitting or" Doubling Down" particularly when that Player shows a pair of 4's or 5's. The Dealer must not assume anything!
3. The Dealer must announce "DOUBLING DOWN ON A HARD 12 or higher, to alert that Player as well as a Floor Supervisor or above when a Player elects to double down on a hard total of twelve (12) or higher.
4. The Dealer will size into a bet twice when paying a double down wager of one color. If the double down is for less, the Dealer must cut into the front of each stack. The Dealer may not combine double down stacks into one stack when paying unless instructed to do so by a Floor Supervisor or above.
5. The Dealer, when paying "in total" or when converting a Player's payoff and bet into higher denominations of cheques, will pay off the total amount owed to the Player by announcing clearly and loudly the amount to be paid, and by cutting the payoff to the

side and slightly to the front of the original bet. The Dealer must not make conversions, other than color, unless specifically told to do so by a Floor Supervisor or above.

6. A Player may duplicate any original bet when doubling down **including** a table maximum wager. Conversely, a Player may double down for any amount less than his original wager.

SPLITTING HANDS

1. A Player may elect to split his cards into two separate hands whenever the initial two cards dealt to the Player are of the same value.
2. The Dealer must ensure that any additional wager be of equal value to the original wager.
3. The Dealer must not assume anything and must ask the Player if he is splitting, especially if that Player's cards are a pair of 4's or 5's.
4. The Dealer will place the original wager on the Dealer's left side of the betting area and will place the new wager on the Dealer's right side of the betting area. Each wager will bisect the betting circle.
5. The Dealer will deal a second card to the first card split, announce the point total of the hand, and wait for the Player's hand signal to stand, draw, or double down. The Dealer must complete action on that Player's first hand and receive a clear hand signal "to stand" **before** proceeding to deal any cards to the second half of the split hand.
6. A Player may split pairs up to two times, generating three hands. Aces may be split up to two times, generating three hands, but only on a shoe game, not Double Deck.
7. A Player who splits Aces will receive **only one additional card** on each Ace. The Dealer will expose each additional card and place it **face up** perpendicular to each Ace.
8. A Player must receive at least one additional card for each card split.
9. A Player may elect to double down on any of his split hands, unless he has split two Aces. The double down bet on any split hand is placed to the Dealer's right of the original wager for that hand (**see illustration next page**). If a Player splits Tens and receives an Ace as a draw card, that hand cannot be doubled down because that hand totals "21."

10. The Dealer will treat split hands as separate hands when paying and taking. Therefore, the Dealer will pay each hand separately. The Dealer, however, must not "push" two split hands if one wins and the other loses.
11. The Dealer must pay separately split hands with multi-color wagers. Barber pole payoffs are not permitted.
12. The Dealer will ensure that an Insurance wager is placed to the Dealer's right of the original bet - between the split hands.

NO PEEK 21 CARD READERS

1. Upon opening the game the Dealer and/or Floor Supervisor or above will inspect the *No Peek 21* card reader. With a ten valued card and an ace check to see that the lights are working properly. Also check with a non ten or ace to see if all the lights are working properly, if it does not work properly alert the Pit Manager.
2. Procedure if Dealer has a ten showing:
 - a. Dealer will finish giving two cards to all players. With the ten-valued card properly obscuring the Dealer's down card, the Dealer will slide the two cards into the *No Peek 21* card reader.
 - b. It is important that the cards remain vertical on the layout. Do not insert the cards horizontally into the *No Peek 21* card reader for ten valued cards.
 - c. If the red light comes on in the *No peek 21* card reader the Dealer will announce, "Dealer has blackjack." Then proceed to expose the down card, pick up the losers and push any player blackjacks. If the Dealer sees a green light come on in the *No Peek 21* card reader the Dealer will continue play as usual.
3. Procedure if the Dealer has an ace showing:
 - a. Dealer will finish giving two cards to all players.
 - b. The Dealer will then give all of the players an opportunity to take insurance.
 - c. With the ace properly obscuring the Dealer's down card the Dealer will slide the two cards, horizontally, into the *No Peek 21* card reader. It is important that the cards go into the *No Peek 21* card reader horizontally. **Do not insert the cards vertically into the *No Peek 21* card reader for aces.**

- d. If the Dealer gets a green light in the *No Peek 21* card reader window the Dealer will proceed to pick up all losing insurance wagers, pay all winning blackjacks, and continue play as usual. The Dealer forgets to put the cards in the card reader, and turns over a blackjack, call the Floor Supervisor or above over immediately. The Floor Supervisor or above will inform the players that the hand plays as is.

BLACKJACKS

1. When a Player has Blackjack and the Dealer is showing 2-9, the Dealer will immediately pay the Blackjack at odds of 3 to 2 (one and a half times the original bet) and remove those cards before acting on any other hand(s).
2. If the Dealer's up card is showing a 10 point value card or an Ace **and** a Player has Blackjack, the Dealer will **not** pay that Player's Blackjack until he determines whether or not he also has blackjack.
 - a. If the Dealer does not have Blackjack and has a hand totalling **less** than 17, the Dealer will pay a Player's Blackjack and remove that Player's cards immediately **before** the Dealer takes any additional hits.
 - b. If the Dealer **and** the Player both have Blackjack, the Dealer will push the Player's hand, then pay any insurance wager 2 to 1.
3. The Dealer, when paying a Blackjack, will cut into the original bet once and will lay the remaining half of the payoff next to it. **There is no converting on Blackjacks.**
4. The Dealer, when paying a Blackjack wager consisting of multi-colored cheques, must break down each denomination of cheques according to standard Blackjack procedure. The Dealer will place the highest denomination cheques in front and lowest in back and, if necessary, break down each color horizontally.
5. The Dealer may cut the bet in half and **size into ONE of the HALF stacks three times** on bets of six cheques or more of the same color. The Dealer will pay any odd cheques in the back by cutting out the correct payoff for that cheque, stacking it in order (highest denomination cheques on the bottom) and placing a stack of the color on top. The Dealer will pay the odd cheque in the back first and then size into the front stacks three times with the remaining cheques.
6. The Dealer must break down multi-color Blackjacks with the highest denomination in front and the lowest in back. The Dealer will pay multi-color bets color for color, but

when the payoff for each color is also multi-color, the Dealer would best consider the total amount and pay it as a total.

7. EXAMPLE: A \$40.00 bet of 1 green and 3 red cheques should be paid as a total (Totaling) amount and not color for color. The preferred payoff is \$60 - 2 green and 2 red. The Payoff is made slightly to the front and to the side of the original bet.

INSURANCE

1. The Dealer must announce, "INSURANCE IS AVAILABLE" in a loud and clear voice **only** when the Dealer's up card is an Ace. Simultaneously, the Dealer will run his right hand **palm up** from left to right and back along the full length of the insurance line.
2. A Player may make an insurance wager for any amount up to 1/2 of the original wager.
 - a. EXCEPTION: A \$3 bet or any bet involving \$.50. With a \$3 bet, the Player has the choice of insuring for less or placing a wager of \$2 for insurance. When figuring the amount for the insurance involving \$.50, the Dealer will consider that \$.50 as the next whole dollar amount. This amount is then divided in half.
 - b. EXAMPLE: The Dealer figures a \$7.50 bet as an \$8.00 bet when figuring the maximum amount allowable for insurance; therefore, the insurance would be up TO \$4. 00. In the event that the insurance bet exceeds half the Player's original wager by \$.25, as referred to above, the winning insurance wager is paid at odds of 2 to 1. EXAMPLE: A \$17-50 bet may be insured \$9.00 which will pay \$18.00.
3. The Dealer must verify all insurance wagers and make any corrections before acting on that hand. If a Player has insured for less, the Dealer should confirm that by asking "Insuring for less?" It is a courtesy to the Player and will help remind the Dealer that in the case of a Blackjack, **the Player's bet will not be the correct insurance payoff.**
4. The Dealer will ensure that all insurance wagers be placed immediately after the second card is dealt to each Player and prior to a Dealer taking any action on a Player's hand.
5. The Dealer will ensure the insurance bet be placed on the layout in the designated space between the two lines marked "INSURANCE BETS". The wager will be placed to the Dealer's right of the original wager.
6. The Dealer will pay all winning insurance wagers at odds of 2 to 1.
7. The Dealer will pay a winning insurance wager with the losing, original bet only if that Player has insured to the full amount.

8. The Dealer will place the losing wager into the bank rack and pay the winning insurance wager with "clean money" only if the losing, original wager is not the correct amount to pay the winning, insurance wager.
9. A Player may insure a token bet. A Player will place a token insurance bet next to that Player's own insurance bet on the insurance line and will be governed by the same rules and procedures as any other insurance bet.
10. If the Dealer **does not** have Blackjack but does have a **hitting hand**, the Dealer must immediately collect all insurance bets as well as any bets from broken hands. The Dealer will then collect the cards from any broken hands, pay any Blackjacks and collect those cards as well. The Dealer will then complete his own hand and pay or take from right to left.
11. If a player desires to insure a blackjack the Dealer shall pay him even money and lock up the cards.

CHEQUES PLAY

1. The Dealer must announce in a loud and clear voice, "CHEQUES PLAY" under the following conditions:
 - a. When a Player wagers any bet of a hundred or more for the first time.
 - b. When a Player makes a substantial increase in his normal wager (i.e., a bet ten times or more than his average bet.)
2. If a player bets more than \$100 on a table, alert the Floor Supervisor or above by using the words "cheques play." It is important the Dealer make sure that the Floor Supervisor or above is made aware of a player who is betting \$100 or more a hand. If the player maintains this action then it is not necessary to repeat "cheques play." If a player, new to the table or otherwise, bets black or a higher denomination of color it is the Dealer's responsibility to call out the appropriate action. "Black action, purple action, etc." Like "cheques play" the Dealer should only repeat this until the Floor Supervisor or above acknowledges this action. If a player, new to the table or otherwise, bets \$500 or more the Dealer **will not deal until the Floor Supervisor or above acknowledges his purple action, or "cheques play."** Anytime that a player jumps his/her action by 10x the Dealer should say "cheques play."
3. Once the Dealer has announced and a Floor Supervisor or above has acknowledged "Cheques Play" for any one Player, the Dealer does not need to repeat the same announcement for each consecutive hand thereafter.

CHEQUE CHANGE

1. A Player will place cheques on the gaming layout. The Dealer must not take cheques directly from a Player's hand. The Dealer **must clear his** hands **before** bringing in any cheques.
2. The Dealer will bring the shoe in towards the rack as to maintain visual contact with the shoe while performing any cheque changing.
3. The Dealer will bring in a Player's cheques and cut out the cheques on the left side of the working area.
4. The Dealer will cut out cheque change in the working area to the right of the Player's cheques being changed.
5. The Dealer must announce the final total of cheques going out before delivering them to the patron. The Dealer must NEVER place change in the betting circle/area.
 - a. EXAMPLE: Cheque change fifty
6. The Dealer must receive verbal acknowledgement from a Floor Supervisor or above for cheque change of one hundred or more.
7. The Dealer will place cheques in front of the Player and behind the betting circle. The Dealer must NEVER place change in the betting circle/area.

CURRENCY CHANGE

1. A Player will place cash on the gaming layout. The Dealer must **never** take money or cheques directly from a Player's hand. The Dealer must have the Player place the cash or cheques on the layout.
2. The Dealer will announce "CHANGE (**whatever the amount of that Player's buy-in**)" in a clear and loud voice.
3. The Dealer must convert all currency into gaming cheques for the purpose of wagering. Cash is **never** played.
4. The Dealer must count all currency in the working area.

5. The Dealer will count all bills from left to right starting with the highest denomination. The Dealer will overlap the currency placing it in vertical columns of five down and not more than five across. **The following exceptions apply:**
 - a. The Dealer will overlap \$5 bills in rows of five down and up to four across.
 - b. The Dealer will overlap \$50 bills in rows of four down and up to five across.
6. The Dealer will place a single bill vertically in the working area.
7. The Dealer will space the rows so that the currency can be easily counted.
8. The Dealer **must** receive a verbal acknowledgement from a Floor Supervisor or above for change of one hundred dollars or more. The Dealer will properly spread the currency to the left and cut out the proper amount of cheques from the bank rack placing them to the right **before** calling a Floor Supervisor or above.
9. The Dealer must leave all currency spread until **after** the Dealer delivers the cheques to the Player.
10. The Dealer will place cheques in front of the Player and behind the betting area. The Dealer must NEVER place cheques directly in the betting circle/area.
11. For Buy-ins which are changed into more than twenty units and/or different color stacks, (see # 14) the Dealer will send them out in multiple stacks using the hand closest to the Player.
12. For large buy-ins where the number of bills of the same denomination exceeds five rows, the Dealer will announce the total of each five row spread to the Player and a Supervisor or above (do not proceed any farther until a Floor Supervisor or above is present). The Dealer will then stack the bills and place them **face down** next to the paddle. The Dealer will follow this procedure for each five row spread placing each stack **face down** at right angles to the previously counted stack. The last spread is left on the layout until the cheques are handed out.
 - a. NOTE: It is extremely important that each stack contains the correct spread total as the total is verified by counting stacks.
 - b. EXAMPLE: A Player buys in for \$2000 in twenties. The Dealer will count the bills five down (\$100.), five across (\$500.), three stacks of \$500. The Dealer will place each row **face down** and overlapping at right angles by the paddle only after the Dealer announces the amount. The Dealer will leave the last \$500 on the layout and proceed to cut out \$ 2000 in cheques.

13. The Dealer must always confirm the transaction with that Player before handing out any cheques. The Dealer must make eye contact with the Player and announce the amount of change to confirm the amount presented by the Player and changed by the Dealer. After the cheques are delivered to the Player, the Dealer will then drop the currency one stack at a time.
14. The Dealer will give at least twenty units of the denomination required to play the table minimum and the rest in the next color(s) up, unless the Player requests otherwise.
 - a. EXAMPLE: A Player buys in for \$500 on a \$10 table; the correct change is \$100 (twenty units) of \$5 (red) cheques and \$400 in \$25 (green) cheques. The Dealer will cut out 4 stacks of 5 cheques each in red; and 4 stacks of 4 cheques each in green. The Dealer will cut out the required number of cheques on the layout before receiving approval from a Floor Supervisor or above.

COLOR IN

1. The Dealer will "color up" only when a Player or a Floor Supervisor or above requests an exchange of cheques of one denomination for cheques of a larger denomination. The Dealer must **not** call a Player back to the table to request a color up.
2. The Dealer will announce, "COLOR COMING IN" and wait for approval from a Floor Supervisor or above before bringing in any cheques for color change.
3. The Dealer will bring the shoe in towards the rack as to maintain visual contact with the shoe while performing any "color in" procedures.
4. The Dealer will bring color in and display it on the layout to the left side of the bank roll **only** after receiving verbal approval from a Floor Supervisor or above.
5. The Dealer, when bringing in any amount of mixed denominations of color, must adhere to the following guidelines:
 - a. The Dealer will start with the highest denomination of color when counting cheques;
 - b. The Dealer will place other cheques of the next highest denomination of color to form a row equaling an even unit such as \$500, \$100, or \$25.
 - c. The Dealer, unless instructed otherwise by a Floor Supervisor or above or requested by a Player, will color up a Player's cheques **only** to the next highest

denomination (For example: red cheques to green, green cheques to black, black cheques to purple, etc.)

6. The Dealer, when bringing in a large amount of the same color cheques, must adhere to the following guidelines:
 - a. The Dealer will "Prove" one stack of twenty of the Player's cheques, and then stack them on the left.
 - b. The Dealer will size into that proven stack with any additional cheques brought in until all of that Player's cheques are counted.
 - c. The Dealer will re-cut a full stack of cheques when the last stack of twenty high has been counted and leave it cut out for all of those present to see.
 - d. The Dealer will cut out any remaining cheques to the right of the full rows of twenty.
 - e. The Dealer will cut out those cheques to be delivered to the Player on the right side of the working area, to the right of the color which was just brought in.
 - f. The Dealer must announce the total of the color change for a Floor Supervisor or above's verification. If there is a full stack which was cut out after being "proven", the Dealer will stack it before delivering any cheques to the Player.
7. The Dealer must receive approval from a Floor Supervisor or above before delivering "colored up" cheques to a Player.
8. The Dealer should make eye contact with the Player and repeat the total amount as he delivers the cheques to that Player which helps ensure good game protection and prevents any arguments regarding the amount received by the patron.

CONVERSIONS

1. The Dealer will pay color for color unless a Floor Supervisor or above authorizes a total conversion in which a Player's entire original wager is taken and replaced with the next highest denomination of cheques.
 - a. EXCEPTION: The Dealer will pay a \$2.50 cheque by placing a \$5 cheque directly next to the \$2.50 cheque and remove the \$2.50 cheque.
2. Types of Conversions:

a. COLOR CONVERSION (totaling)

- i. Paying lower value cheques with higher value cheques of one color difference is a color conversion and usually does not need Floor Supervisor or above approval. However, some Players enjoy wagering all red and may ask to be paid color for color because they believe it is lucky for them.
- ii. EXAMPLE: A Player wins a seventy five dollar bet consisting of one green cheque and ten red cheques. If the Player has numerous red cheques and has been placing wagers of \$25 or more, the Dealer should pay with three green cheques.
- iii. EXAMPLE: The Dealer when paying red with green, pay a \$25 wager (consisting of five \$5 cheques) with \$25 (consisting of one \$25 cheque).

b. PARTIAL CONVERSIONS

- i. Taking part of a player's wager to arrive at the payoff.
- ii. One cheque snatch
 - 1. EXAMPLE: The Dealer will pay a \$45 wager with \$50 and take one \$5 cheque.
- iii. Multiple cheque snatch
 - 1. EXAMPLE: The Dealer will pay a \$15 wager with \$25 and take two \$5 cheques.

c. TOTAL CONVERSIONS

- i. Taking all of a Player's wager on the payoff. The Dealer will cut down the Player's cheques and leave the stack cut down until the entire transaction is complete.
 - 1. EXAMPLE: The Dealer will pay a \$50 bet (consisting of all \$5 cheques) with. \$100 (consisting of four \$25 cheques) and take the Player's original \$50.
- ii. The Dealer must explain to the Player a total conversion while performing the transaction.

1. EXAMPLE: The Dealer will announce, "Paying \$50 with \$100; taking \$50."
3. The Dealer must not convert Blackjacks except in the case of a \$2.50 (pink) cheque or when instructed to do so by a Floor Supervisor or above.
4. The Dealer must keep the payoff separate from the original bet.
5. The Dealer should not convert a Player completely so as to void that Player of the color he is wagering unless specifically told to do so by a Floor Supervisor or above.
6. The Dealer must not convert a Player to \$100 cheques or higher without the approval of a Floor Supervisor or above.
7. The Dealer must not take cheques from a Player's wager for conversion while the Dealer has any other cheques in hand.

TOKES

1. The soliciting of tokens is strictly prohibited.
2. The Dealer must drop both the wager and the payoff on all of the winning token wagers. The Dealer may not parlay token wagers.
3. If a Player splits a hand, the original token wager will be placed with the original wager (the wager to left of the Dealer).
4. If a Player is betting less than the table maximum, the Player may wager any amount for the Dealer as long as the combined amount does not exceed the table maximum.
5. If a Player is betting the table maximum, the token wager must not exceed 10% of that amount.
6. The Dealer always must drop a token wager after all of the Players, wagers have been paid and the cards have been picked up and placed in the discard rack.
7. The Dealer must not drop \$100 cheques or higher unless authorized by the Pit Manager. Any token wager requiring color change also requires the approval of a Floor Supervisor or above.
8. The Dealer, using his left hand, will deposit tokens in the locked box reserved for that purpose.

9. Token bets may be insured by a Player.
10. When a Player's wager loses, so too does the token wager.
11. The Dealer will pay a Player's winning wager prior to paying the token wager.
12. When the Dealer is given the choice of dropping a token or having it wagered on a Player's hand, the Dealer **must** accept the token and drop it.
13. The Dealer must thank the Player and acknowledge that Player's generosity.

TABLE MINIMUM AND MAXIMUM BETS

1. The Dealer must be responsible for knowing the minimum and the maximum table limits of their table.
2. The Dealer who does not notice that a Player has wagered less than the table minimum **before** he deals the cards, will pay or take the amount wagered and **politely** inform that Player of the table minimum for future hands.
3. The Dealer will announce in a loud clear voice, "TABLE MAX" when a Player wagers the table maximum.
4. If the Dealer is unsure of whether or not a wager exceeds the table maximum, the Dealer must announce in a loud and clear voice, "PAY OR TAKE TO THE TABLE MAX". A Floor Supervisor or above should ensure that the Player fully understands that any overage will not be paid or taken. The Dealer will then proceed to deal.
 - a. The Dealer will remove a losing wager from the betting area and cut it down in the Dealer's working area to determine that the wager does not exceed the table maximum. The Dealer will return any cheques over the table maximum to the Player.
 - b. The Dealer will break down a winning wager in the betting area and the appropriate amount of the cheques will be taken from the tray, proven, and paid. When sizing into the winning wager, the Dealer will return to that Player any overage.
 - c. If the Dealer does not announce "PAY OR TAKE TO THE TABLE LIMIT" and the Player's wager exceeds the table maximums, the Dealer will still take or pay that wager to the table maximum.

5. Casino Management at their discretion may allow a Player to bet over the table maximum. The Dealer will be informed of any authorized betting arrangements.

IRREGULARITIES

1. The Dealer must notify a Floor Supervisor or above immediately when any irregularity occurs.
2. A card found **face up** in the shoe will not be used in that hand and must be placed in the discard rack.
3. A card drawn in error without exposing its face will be used as though it were the next card from the shoe. It will not be used as the first card of the next hand (burn it.)
4. After the initial two cards have been dealt to each Player and a card is drawn in error and exposed to the Players, that card **will** be used for the Players or Dealer as though it were the next card from the shoe. Any Player refusing to accept such card will **not** have any additional cards dealt to him during that round. If the card is refused by all Players and the Dealer cannot use the card, that card must be burned.
5. If the Dealer has 17 or more and accidentally draws a card for himself, that card must be burned.
6. If the Dealer misses dealing the first or second card to himself, the Dealer must complete dealing the first two cards to each Player and then deal the appropriate number of cards to himself.
7. If there are insufficient cards remaining in the shoe to complete a round of play, all of the cards in the discard rack are shuffled and cut according to procedure. The first card is drawn face downwards and burned, and the Dealer will complete the round of play.
8. If no cards are dealt to a Player's hand, the hand is dead and the Player will be included in the next round. If only one card is dealt to a Player's hand at that Player's option, the Dealer will deal the second card to the Player after all other Players have received a second card.
9. If a Player misses being hit, a Floor Supervisor or above will offer the Player the option of calling the hand "dead" or playing the hand out only after all other Players have completed hitting their hands. Should that Player elect to call his hand dead, that Player's original wager will be returned.

10. Dealer must not hit his hand until all Players have completed their hands. The Dealer will remove the full stack of cards from the discard holder and place them in a single stack in the center of the table inside the insurance line, then begin the regulation shuffle.
11. The Dealer will divide the cards into two approximately equal stacks. The Dealer will place one stack to the left and one stack to the right of the center of the table just inside the insurance line leaving enough space between the two stacks to place a third stack.
12. The Dealer will turn the **right** stack of cards clockwise 180 degrees.
13. The Dealer will take approximately three quarters of a deck from each of the two stacks, riffle once, and place those cards between the right and left stacks above the shuffling area.
14. The Dealer will then take half of the cards from the **center** stack just shuffled and three quarters of a deck from the **left** stack and riffle once.
15. The Dealer will take the remaining cards from the **center** stack and place them on top of the stack of cards just riffled and move forward this new, combined stack placing them between the remaining right and left stacks.
 - a. Note: The Dealer must place those riffled cards under the center stack.
16. The Dealer will then take approximately three quarters of a deck from the **right** stack and three quarters of a deck from the **center** stack and riffle once.
17. The Dealer will again place the center stack on top of the stack of just riffled cards and move forward this new, combined stack placing them between the remaining right and left stacks.
 - a. Note: The Dealer must place those riffled cards under the center stack.
18. The Dealer will take approximately three quarters of a deck from the **left** stack and three quarters of a deck from the **center** stack, riffle once, and move forward this new, combined stack placing them on top of the center stack.
 - a. Note: The Dealer must place those riffled cards on top of the center stack.
19. The Dealer will take three quarters of a deck from the **right** stack and three quarters of a deck from the **center** stack, riffle once, and move forward this new, combined stack placing them on top of the center stack.

- a. Note: Notice the Dealer will place the first two riffled stacks under the center stack; the Dealer will place the balance of riffled stacks on top of the center stack.

21 + 3 Procedure Manual

INTRODUCTION

3 card poker side bet on a 6 and 8-deck Blackjack

BETS

21 the regular blackjack bet

3 the 3-card poker bet

TOKES

Token bets may be placed by at either 21 or 3 or both

Token 3bet may not be more than player 3 bet

Winning token bets paid same odds as player bet

RULES

Player first 2 cards and dealer up card form that player 3 hand

HAND RANKS OF WINNING HANDS

Flush three of the same suit

Straight three in sequence (includes 2 Ace)

Three of a Kind three of the same rank

Straight Flush three in sequence suited (includes 3 2 Ace)

Note Flush may also include Pair or Three of a Kind

Procedure

21 bets and optional 3 bets placed

Deal as in standard multi-deck Blackjack

Resolve each 3 bet from dealer right to left

Settle each 3 bet in order

Take losing 3 bet

Pay winning 3 bet 9 to 1

Cut out payoff in work area

Push stack and bet toward player beyond bet areas

Walk the game

Use right hand to at least the center spot and left hand for last spots

Pay token payoffs separately and take immediately

After all 3 bets are resolved standard Blackjack procedure applies

Insurance and hole-card peek after 3 bets resolved

Quapaw Tribal Gaming Agency



Date Received	4/21/11
Comments	
Reviewed By	JB 5/6/11 Bn 5/11/11 8/5/11-11
Approved	Tentative
Not Approved	Final

Policy and Procedure Submission

Policy Name and Number: <i>Internal Controls for the Bad Beat Progressive Jackpot and the Royal Flush Progressive Jackpot Promotion</i> Policy #1100.18.03	Department: Poker	Submission Date: 4/21/2011
Narrative Description: To establish a policy documenting procedures for the Bad Beat Progressive Jackpot and Royal Flush Progressive Jackpot promotions. This is a revision based off QTGA comments provided to us on 4/18/2011.		DCR/QTGA Tracking: POLICIES & PROCEDURES DDA APPROVED JUL 06 2011

DCR Compliance Authorization

Signature: Stephanie Ball 2551

Date: 4/19/11

Department Director Authorization

Signature: [Signature] 29x

Date: 4/19/2011

General Manager Authorization

Signature: [Signature]

Date: 4/20/11

QTGA Authorization

Signature: [Signature]

Date: 5/16/11

INTERNAL CONTROLS FOR THE BAD BEAT PROGRESSIVE JACKPOT PROMOTION AND THE ROYAL FLUSH PROGRESSIVE JACKPOT PROMOTION	Policy No: 1100.18.03	Issue Date: 5/16/2011
PURPOSE: To establish procedures for the Bad Beat Progressive Jackpot and Royal Flush Progressive Jackpot promotions.		

DCR Compliance – ITEM Tracking	Date
Issue Date	5/16/2011
QTGA Submission	9/11/2009
Compliance Review	11/18/2009
QTGA Submission	11/25/2009
QTGA Return	12/21/2009
Compliance Review	3/15/2010
QTGA Submission	4/1/2010
QTGA Return	4/15/2010
Compliance Review	5/27/2010
QTGA Submission	5/27/2010
QTGA Return	6/3/2010
Compliance Review	6/11/2010
QTGA Submission	6/17/2010
QTGA Return	7/1/2010
Compliance Review	7/2/2010
QTGA Submission	7/8/2010
QTGA Return	7/21/2010
Compliance Review	7/26/2010
QTGA Submission	7/29/2010
QTGA Return	8/4/2010
Compliance Review	8/4/2010
QTGA Submission	8/5/2010
GM Approval	8/9/2010
QTGA Final Approval	9/1/2010
DDA Final Approval	9/7/2010
Revision to DDA Final Approved	1/27/2011
QTGA Submission	1/31/2011
GM Approval	1/28/2011
QTGA Approval	2/18/2011
DDA Approval	3/8/2011
Compliance Revisions to Version 2	3/16/2011
QTGA Submission	3/18/2011
QTGA Return	3/18/2011
Compliance Revision	4/5/2011
QTGA Submission	4/7/2011

QTGA Return	4/18/2011
Compliance Review	4/19/2011
QTGA Submission	4/21/2011
QTGA Final Approval	5/16/2011
GM Approval	4/20/2011
DDA Approval	7/6/2011

POLICY

1. All funds contributed by the players into the bad beat progressive pool shall be returned when won in accordance with the posted rules and with no commission or administrative fee withheld.
2. Rules governing the Bad Beat Progressive Jackpot, the Royal Flush Progressive Jackpot, and any other jackpot promotions will be conspicuously posted and brochures explaining the rules will be available to any player, which will include the rules below.

BAD BEAT PROGRESSIVE JACKPOT RULES

1. Jackpot totals will be updated and posted daily.
2. Any Texas Hold'em games from which a jackpot donation is taken will be eligible for the Bad Beat Progressive Jackpot.
3. A jackpot fee of \$1.00 will be taken when the pot reaches \$30.00.
 - a. The jackpot fee shall not be placed in or near the rake circle, in the drop box, or commingled with gaming revenue from card games or any other game. It shall be placed in the Jackpot Drop Box. A rake is the amount of gaming chips collected by the dealer as poker revenue.
 - b. The jackpot fee must be taken for that hand to be eligible for the jackpot; therefore the pot must be at least \$30.
 - c. The total pot shall include the rake and jackpot fee.
4. At least four players must be dealt in for that table to be eligible for the jackpot.
5. If an all-in player is participating in a pot, or participating in a side pot and main pot combined, that totals less than \$30 and has not paid the \$1 jackpot fee, that player is ineligible to win the jackpot. An all-in player may not inadvertently win the jackpot if a side pot is created that pays the jackpot fee. This does not change eligibility for player shares of the bad beat or royal flush jackpots, as players have to be active in a jackpot game, but do not have to be actively playing a hand, to be eligible for those shares. This means that all-in

players not paying the jackpot donation and possessing a hand that would normally qualify for the bad beat or royal flush jackpots would receive a player share of the jackpot and nothing further.

6. All winners must be 18 years old and have valid identification, which can be one of the following:
 - a. Valid U.S. State drivers license
 - b. U.S. State-issued identity card
 - c. U.S. Military identity card
 - d. U.S. Government-issued identity card
 - e. Valid U.S. Passport

See Universal ID Acceptance Policy #6320.15.01 for additional information on acceptable identity cards.

7. Distribution of jackpot funds will be as follows:
 - a. 65% to the main jackpot
 - b. 25% to the primary backup jackpot
 - c. 10% to the secondary backup jackpot
 - d. 35% of jackpot funds will be allocated to a Player Promotional Fund
 - e. 100% of promotional funds will be returned to players through various forms of cash awards, such as cash drawings and free roll tournaments.
8. A Bad Beat Jackpot is a payout that occurs when four deuces (2's) or a better hand loses to a higher hand. To be eligible:
 - a. The winning and losing hands must use both hole (down) cards (refer to page 2 of Poker manual for definition).
 - b. Any four-of-a-kind must be made from a pocket pair.
9. All qualifying hands are eligible to share in the jackpot, even if two or three losing hands would qualify for the bad beat jackpot (e.g., if the final board reads 7h 8h 9h 8s 9s and J-10h, 5-6h, 8c-8d, and 9c-9d were shown at the end of the hand, all hands would qualify).

10. Management reserves the right to change the eligible jackpot hand.
 - a. Notice will be provided to the Quapaw Tribal Gaming Agency (QTGA) in writing 10 days before and posted conspicuously in the Poker Room.
11. Players must play their hands independently. Any discussion of the jackpot during the play of the hand may void qualification for the prize. If any player, whether directly or indirectly involved in the hand, passes information or instructs another player on how to act or reveals his/her hand to other players, the Bad Beat will be disqualified.
12. Management reserves the right to verify eligibility of all qualifying hands. There will be no recourse if the cards are mucked before surveillance is able to verify the hands and the community cards. Poker Management will not be permitted to reconstruct the hands in any way.
13. Payouts are as follows:
 - a. When one losing hand is eligible:

i. Losing hand	40%
ii. Winning hand	20%
iii. All players in the room	40%, divided equally among them
 - b. When two losing hands are eligible:

i. Best losing hand	33%
ii. 2 nd best losing hand	20%
iii. Winning hand	17%
iv. All players in the room	30%, divided equally among them
 - c. When three losing hands are eligible:

i. Best losing hand	25%
ii. 2 nd best losing hand	20%
iii. 3 rd best losing hand	15%
iv. Winning hand	15%

v. All players in the room 25%, divided equally among them

14. For players at other tables to be eligible for their portion of the jackpot, those players must have taken a hand within the five minutes prior to the jackpot being announced and must still be in action, meaning that the player's chips must still be on the table. Also, any player that has a missed blind button and owes the blinds will not be eligible for any share of the bad beat jackpot.

ROYAL FLUSH PROGRESSIVE JACKPOT RULES

1. Any Texas Hold'em games from which a jackpot donation is taken will be eligible for the Royal Flush Progressive Jackpot Promotion.
2. All rules that have to do with table eligibility and player eligibility for the Bad Beat Progressive Jackpot apply to the Royal Flush Progressive Jackpot as well.
 - a. A jackpot fee of \$1.00 will be taken when the pot reaches \$30.00.
 - b. The jackpot fee shall not be placed in or near the rake circle, in the drop box, or commingled with gaming revenue from card games or any other game. It shall be placed in the Jackpot Drop Box. A rake is the amount of gaming chips collected by the dealer as poker revenue.
 - c. The jackpot fee must be taken for that hand to be eligible for the jackpot; therefore the pot must be at least \$30.
 - d. The total pot shall include the rake and jackpot fee.
3. If one or more side pots are generated during the hand, any player or players all in for the main pot or side pot that together does not add up to \$30 will not be eligible for the Royal Flush Progressive Jackpot. This means that if a player is not participating in a pot or side pot that has paid the jackpot fee this player is ineligible to win the jackpot.
4. All winners must be at least 18 years old and have valid identification, which can be one of the following:
 - a. Valid U.S. State drivers license
 - a. U.S. State-issued identity card
 - b. U.S. Military identity card
 - c. U.S. Government-issued identity card

d. Valid U. S. Passport

See Universal ID Acceptance Policy #6320.15.01 for additional information on acceptable identity cards.

5. A Royal Flush Jackpot is a payout that occurs when a player makes the highest possible hand, a Royal Flush, which is made up of the 10, J, Q, K, and A of one suit. To be eligible, the hand must be made using both hole cards. For example, if the final board reads Jd Qd Ad 7c 8h, and a player held the Kd 10d, this hand would be eligible to win the Royal Flush Progressive jackpot. If the final board reads 10s Js Qs Ks 4c, and a player holds the As Jc, this hand would not be eligible for the Royal Flush Progressive Jackpot Promotion.
6. The amount of the Royal Flush Jackpot will be 4% of the Main Jackpot amount of the Bad Beat Progressive Jackpot for spade royal flushes and 2% of the Main Jackpot for royal flushes in the other three suits (clubs, diamonds or hearts).
7. Distribution of the Royal Flush Progressive will be as follows:
 - a. To the player making the royal flush: 70%
 - b. To the rest of the players dealt in the hand, at the same table: 30%
 - i. Any players not specifically dealt into the hand during which the royal flush occurs, shall not be eligible for a portion of the jackpot.
6. If a Royal Flush is made in a hand that also is a hand in which the Bad Beat Progressive Jackpot occurs, that hand is only eligible for the Bad Beat Progressive Jackpot and not the Royal Flush Jackpot.
7. Players must play their hands independently. Any discussion of the jackpot during the play of the hand may void qualification for the prize. If any player, whether directly or indirectly involved in the hand, passes information or instructs another player on how to act or reveals his/her hand to other players, the Royal Flush will be disqualified. Poker and Casino Management reserve the right to make this determination.
8. Management reserves the right to verify eligibility of any qualifying hand. However, players will have no recourse if the cards are mucked (discarded) before surveillance is able to verify the hand and the community cards. Poker Management will not be permitted to reconstruct the hand in any way.

JACKPOT PROCEDURES

1. Progressive jackpot collection will be dropped and accounted for separately from the house rake according to DCR Accounting, Main Cage, Auditing, and QTGA Internal Control standards.
2. The dealer shall deposit the jackpot fee into the jackpot drop box located at each participating table.
3. The jackpot drop boxes will be collected and counted daily.
4. The Count team will record the counts and the payouts on the daily jackpot amounts on a Bad Beat count sheet, a copy of which shall be provided to the Poker Department daily and to the QTGA upon request.
5. Jackpot totals shall be posted conspicuously in the poker room on a 24 hour basis and must be in full view of a surveillance camera dedicated to viewing of the posted jackpot totals.
6. Jackpot totals must be posted in the poker room after a jackpot has been hit and on a daily basis in accordance with the posted rules.
7. When a Bad Beat Progressive Jackpot occurs and is paid out, the primary backup jackpot amount will become the new and current main jackpot amount, the secondary backup jackpot amount will become the primary backup jackpot amount, and the secondary jackpot amount will be reset.
8. When a Royal Flush progressive Jackpot occurs and is paid out, the corresponding amount of the jackpot, either 4% or 2%, shall be deducted from the main jackpot of the Bad Beat Progressive Jackpot. A new main jackpot amount shall immediately be posted that reflects the deduction of the Royal Flush Progressive Jackpot from the main amount of the Bad Beat Progressive Jackpot.
9. The reset figures for the respective jackpots will be as follows:
 - a. The Bad Beat Progressive reset will be \$10,000. When monies accrued in the main jackpot fund or either of the backup funds exceeds this figure, then those jackpot funds will be eligible to be increased.
 - b. The Royal Flush Progressive Jackpot, being totally dependent upon the amount of the Bad Beat Progressive Jackpot, will always reset to 4% or 2% of the main jackpot of the Bad Beat Progressive Jackpot.
10. Any interest earned on a progressive jackpot balance shall be credited and posted to the Bad Beat Progressive Jackpot Fund.

- a. The following rules will govern the Jackpot Fund Log (pg. 11):
 - i. A jackpot fund log shall be maintained by the Finance Department. A representative of the Finance Department shall record the amount of each jackpot fund liability sign or meter on a daily basis.
 - ii. The jackpot fund log shall be forwarded to the QTGA at the end of each month, and whenever a bad beat jackpot is awarded. When this log is forwarded, accounting shall reconcile the bad beat jackpot liability to the amount shown on the jackpot fund log and the amount displayed on the jackpot signs or meters in the poker room.
 - iii. The total of the bad beat jackpot amounts awarded per the payout forms for each player must agree to the jackpot liability as recorded on the Jackpot Fund Log. Any variance must be investigated by the Finance Department and the outcome documented with a notation on the Jackpot Fund Log initialed including badge number, by a representative of the Finance Department.

11. The following rules will govern unclaimed jackpots:

- a. In the event that a player does not or cannot claim a jackpot when it is hit, the money will remain in the Main Cage until it is claimed by the player.
- b. Players will be informed that the money will be held up to 1 month from the time of the jackpot.
- c. If the player does not claim the jackpot within 1 month of the occurrence, the money will be returned to the Bad Beat Progressive Jackpot Fund.

12. All jackpots are to be paid out in DCR cash value casino chips with the intention of enhancing action in all areas of the casino and extending play in the poker games.

13. Regarding the presence of DCR Team Members or other persons ineligible for the Bad Beat Progressive Jackpot, the following applies:

- a. If any ineligible player has a hand that results in the occurrence of Bad Beat Progressive Jackpot, the monies that would have been paid out if the player was eligible will be added to the Primary Backup Jackpot and will not be paid out in any way to the winners of the Main Jackpot.
- b. If a non-eligible player makes a Royal Flush, the amount that would have been awarded, had the player been eligible, shall not be deducted from the main jackpot

of the Bad Beat Progressive Jackpot and will not be paid out in any way to players receiving player shares of the Royal Flush Jackpot.

14. The following procedures will be used for the payout of the Bad Beat Progressive Jackpot and the Royal Flush Progressive Jackpot in the poker room:

- a. The Poker Manager, Poker Shift Manager, or DCR Manager on Duty, Surveillance and the QTGA will immediately be notified of a qualifying Bad Beat occurrence.
- b. Any hand of poker that triggers a poker jackpot must conform to the posted Bad Beat Progressive Jackpot Rules in order for a win to be declared.
- c. The Poker Manager, Poker Shift Manager, or DCR Manager on Duty and the Poker Dealer must physically verify the validity of the jackpot, checking the composition of the deck and the dollar amount of the jackpot.
- d. The Poker Manager, Poker Shift Manager, or DCR Manager on Duty must call surveillance to request photo stills of the table the jackpot occurred at, the board cards and qualifying hands, as well as stills of all active tables and the amounts on the Bad Beat Progressive Jackpot sign.
- e. Copies of all relevant photo stills shall be furnished to QTGA upon request and to the Poker Department.
- f. The Poker Manager, Poker Shift Manager, or the DCR Manager on Duty, and a representative of QTGA will then proceed to surveillance to review the qualifying hand. This review will occur prior to any payout of the jackpot.
- g. Surveillance shall store for three years the video playback of the qualifying hand.
- h. Upon consensus that the qualifying hand is a legitimate Bad Beat, the cards are verified at the table and removed from the game and provided to QTGA for inspection. The Poker Manager, Poker Shift Manager, or DCR Manager on Duty shall also inspect the cards to ensure tampering did not occur, thus payment of the prize to the eligible patron shall be made without waiting for the results of QTGA's inspection. Proper ID must be obtained from all players eligible for payouts from the Bad Beat Progressive Jackpot before payment of the prize.
- i. Poker Cage will prepare the Poker Room Tournament Paid Out Form (pg. 10) for each player receiving a payout from the Bad Beat Progressive Jackpot, and will as applicable complete and issue form 1099 or W2-G to winning players; update the W2-G logs; complete Multiple Transaction Logs and Currency Transaction Report by Casinos Form if appropriate; and prepare any other documentation as may be

required to meet cage accountability standards. All players receiving awards from the Bad Beat Progressive Jackpot will complete and sign a W-9.

- j. The Poker Manager, Poker Shift Manager, or DCR Manager on Duty, a Poker Cage Supervisor, a Security officer, and a member of QTGA shall witness the jackpot payment. All winning players must sign the jackpot payout form to evidence receipt of the payout at the time of payment. The Poker Cage Cashier or above that pays out the jackpot payment shall sign, including badge number, the Poker Room Tournament Paid Out Form verifying payment was made.

DOWNSTREAM
CASINO RESORT

1532

**Poker Room Tournament
PAID OUT**

Date: _____ Time: _____

Amount \$ _____ Type: ☐ Cash ☐ Chips

Patron Name: _____
(Please print name)

Q Card # _____

Patron Sig. _____

Cashier Sig./ID# _____

White - Poker Room

Yellow - Patron

Pink - Book

SP 20152

[illegible]

Quapaw Tribal Gaming Agency



Date Received	4/18/11
Comments	
Reviewed By	MM 4/20/11 JB 4/28/11
Approved	Tentative
Not Approved	Final

Policy and Procedure Submission

Policy Name and Number: EGM Tokes Policy #1200.03.01	Department: EGM	Submission Date: 4/7/2011
Narrative Description: To establish policy and procedures for reporting EGM Team Member tokes.		DCR/QTGA Tracking: POLICIES & PROCEDURES DDA APPROVED JUL 06 2011

DCR Compliance Authorization

Signature: Stephani Ball 2551

Date: 4/5/11

Department Director Authorization

Signature: Ruby S. Moeung 621

Date: 4/13/11

General Manager Authorization

Signature: [Signature]

Date: 4/18/11

QTGA Authorization

Signature: Barbara Collins

Date: 5/16/11

EGM - TOKES	Policy No: 1200.03.01	Issue Date: 5/16/2011
PURPOSE: To establish a policy for EGM Attendant Tokes.		

DCR Compliance – ITEM Tracking	Date
Issue Date	5/16/2011
QTGA Submission	9/23/2009
QTGA Return	12/2/2009
Compliance Review	6/24/2010
QTGA Submission	7/1/2010
QTGA Return	7/29/2010
Compliance Review	8/4/2010
QTGA Submission	8/12/2010
QTGA Return	9/1/2010
Compliance Review	9/3/2010
QTGA Submission	9/9/2010
QTGA Return	9/30/2010
Compliance Review	10/7/2010
QTGA Submission	10/14/2010
QTGA Return	11/24/2010
Compliance Review	3/30/2011
QTGA Submission	4/7/2011
GM Approval	4/18/2011
QTGA Final Approval	5/16/2011
DDA Final Approval	7/6/2011

TEAM MEMBER TOKES

Electronic Gaming Machine (EGM) tokens are acceptable, but may not be solicited by EGM Team Members. The following is the procedure for accepting, maintaining, and distributing EGM tokens:

1. Accepting Tokes:

- a. When a token is RECEIVED, the EGM Attendant shall clearly hold the token in their hand and drop the token into a designated token box located near the EGM Fill Jackpot Station (FJP). The EGM Attendant may give the token to an EGM Shift Supervisor or above to take to the token box if unable to do so due to patron service.
- b. EGM Technicians shall not solicit or receive tokens. Any tokens received by EGM Technicians are credited to EGM Attendants.

2. Maintaining Tokes:

- a. All EGM tokens shall be maintained in the designated token containers for a period of one (1) EGM Attendant shift. Should a box become full prior to the end of the shift, it may be dropped with the EGM Shift Manager or above approval.
- b. At the end of each EGM Attendant Shift, the EGM Shift Manager or security shall provide the Cage the locked token box which shall include a two part (white and yellow) EGM Attendant Tokens Form (Pg. 4) which shall list the EGM Attendants that shall receive an equal portion of the total tokens in the box.
- c. The Cage shall store the locked token boxes until the EGM Shift Manager and a Main Bank Cashier or above schedule the verification of the locked token boxes with both parties present. This verification shall happen daily for all locked token boxes.
- d. During verification, each box shall be counted and verified by a minimum of two (2) Team Members (One (1) Main Bank Cashier or above and One (1) EGM Shift Manager) and the total amount and shift ending date shall be clearly marked on a EGM Attendant Token Form (pg. 4). The EGM Attendant Token Form shall be attached to the Main Bank Receiving From Slots form (pg. 5). The Cage shall maintain the white copies of both forms; EGM Department shall maintain the yellow copy of the EGM Attendant Token form. The EGM Shift Manager shall return the yellow copy to the EGM Administrative Assistant.
- e. The funds shall be deposited to the Main Bank as EGM Tokens.
- f. The EGM Shift Manager shall retain the empty locked token box and place in the FJP station for shift use.
- g. The Token box keys shall be maintained in the Main Bank at all times.
- h. All deposits shall be reported by Income Audit to payroll at the end of each pay cycle.

3. Distribution Tokens:

- a. The tokens shall be allocated equally for the number of EGM Attendants listed on the EGM Attendant Tokens Form and the amounts noted with the EGM Attendant information.
- b. The EGM Director or designee shall review and approve the EGM token allocation.
- c. All tokens shall be disbursed on the EGM Attendant's normal pay check.
- d. Tokens may never be personally accepted and kept from the tip pool. Any failure to comply with this policy shall be considered an attempt to circumvent reporting and be subject to Team Member discipline, up to and including termination.

- e. Nothing in the policy prevents the Management of Downstream Casino Resort, the Downstream Development Authority, Quapaw Tribal Gaming Agency, Internal Revenue Service, or any other applicable agency from taking further action against token policy violations as deemed necessary.



EGM Tokes

Date: ____/____/____

Total \$ _____

Shift: (circle one) am amsw pm pmsw gr

Name	Badge#
1	
2	
3	
4	
5	

Name	Badge#
6	
7	
8	
9	
10	

EGM / Badge #

Cage / Badge #

SP 20339

White: Cage

Yellow: EGM

SL1 - 3/16/09

DownStream Casino

FROM: Slots Tokes

Date: 10/07/2010

Time: 08:00:39

Receiving:

DownStream Main Bank

Main Banker:

532 ANDREA WEST

Item Description	Received
Quarters \$ 0.25 Loose	0.25
Currency \$ 20	820.00
Currency \$ 5	25.00
Currency \$ 1	3.00
TOTAL:	858.25

Banker's Name/Signature

532 ANDREA WEST

Supervisor / License #

Employee License / Signature

Security / License #

Quapaw Tribal Gaming Agency



Date Received	4/18/11
Comments	
Reviewed By	MLC 4/20/11 JB 4/21/11
Approved	Tentative
Not Approved	Final

Policy and Procedure Submission

Policy Name and Number: Violation of Internal Controls Policy #1200.08.01	Department: EGM	Submission Date: 3/31/2011
Narrative Description: To establish policy and procedures for notification of internal control violations.		DCR/QTGA Tracking: POLICIES & PROCEDURES DDA APPROVED JUL 06 2011

DCR Compliance Authorization

Signature: Stephanie Batta 2551

Date: 3/29/11

Department Director Authorization

Signature: Robert S. Manning 621

Date: 4/15/11

General Manager Authorization

Signature: Steven Davis

Date: 4/18/11

QTGA Authorization

Signature: Barbara Collins

Date: 5/16/11

EGM – Violation of Internal Controls	Policy No: 1200.08.01	Issue Date: 5/16/2011
PURPOSE: To establish a policy for notification of control violations by a patron or Downstream Casino Resort Team Member.		

DCR Compliance – ITEM Tracking	Date
Issue Date	5/16/2011
Compliance Review	9/1/2009
QTGA Submission	9/23/2009
QTGA Return	12/2/2009
Compliance Review	6/23/2010
QTGA Submission	7/1/2010
QTGA Return	7/29/2010
Compliance Review	8/4/2010
QTGA Submission	8/12/2010
QTGA Return	9/1/2010
Compliance Review	9/3/2010
QTGA Submission	9/9/2010
QTGA Return	9/30/2010
Compliance Review	10/7/2010
QTGA Submission	10/14/2010
QTGA Return	11/24/2010
Compliance Review	12/31/2010
QTGA Submission	1/6/2011
QTGA Return	1/27/2011
Compliance Review	3/29/2011
QTGA Submission	3/31/2011
GM Approval	4/18/2011
QTGA Final Approval	5/16/2011
DDA Final Approval	7/6/2011

NOTIFICATION

1. All Downstream Casino Resort (DCR) Electronic Gaming Machine (EGM) Department Team Members are required to report to their department Supervisor or above any violations or suspected violations of the Oklahoma State Gaming Compact, Quapaw Tribal Ordinance, National Indian Gaming Commission (NIGC), Minimum Internal Control Standards (MICS), Quapaw Tribal Internal Controls (TICS), criminal activity, unusual occurrences, or any other circumstances or behavior that is suspicious either by a patron or DCR Team Member.
2. It is the responsibility of the EGM Department Team Members to contact the EGM Shift Manager or above if suspected violations or suspicious activity has occurred. The EGM Shift Manager or above will notify the EGM Director, Security Shift Supervisor or above, as well as a

QTGA Compliance Agent or above if the behavior or activity warrants such notifications. In all cases that warrant Security and QTGA notifications as described above, an incident report (Pg. 3) must be completed by any of the EGM Team Members or Security Team Members that were involved.

3. Refer to Suspicious Activity Report by Casino (SARC Policy #1400.66.01) for suspicious activity resulting in money laundering or tax evasion. Casinos are required to report suspicious transactions under the Bank Secrecy Act (BSA). BSA regulations require a Casino to file a Suspicious Activity Report by Casinos (SARC) (FinCEN Form 102) when a transaction is attempted that involves or aggregates at least \$5,000 (five thousand dollars) worth of funds or assets and the Casino knows, or has reason to suspect that the transaction, or a pattern of transactions, is an attempt to violate Federal laws.
4. Any other illegal acts should be reported, regardless of the dollar amount.

Quapaw Tribal Gaming Agency



Date Received	4/18/11
Comments	
Reviewed By	MIC 4/20/11 JB 4/28/11
Approved	Tentative
Not Approved	Final

Policy and Procedure Submission

Policy Name and Number: EGM – Ticket Problems and Claims Policy #1200.10.01	Department: EGM	Submission Date: 3/31/2011
Narrative Description: To establish policy and procedures for resolving ticket problems and customer dispute claims.		DCR/QTGA Tracking: POLICIES & PROCEDURES DDA APPROVED JUL 06 2011

DCR Compliance Authorization

Signature: Stephanie Bata 2551

Date: 3/29/11

Department Director Authorization

Signature: Keith S. Manning 621

Date: 4/15/11

General Manager Authorization

Signature: Steven Jones

Date: 4/18/11

QTGA Authorization

Signature: Barbara Collins

Date: 5/16/11

EGM – TICKET PROBLEMS AND CLAIMS	Policy No: 1200.10.01	Issue Date: 5/16/2011
PURPOSE: To establish a policy for resolving ticket problems and customer dispute claims at Downstream Casino Resort.		

DCR Compliance – ITEM Tracking	Date
Issue Date	5/16/2011
QTGA Submission	9/23/2009
QTGA Return	12/2/2009
Compliance Revisions based on QTGA Review	03/15/2010
QTGA Submission	03/25/2010
QTGA Return	4/8/2010
Compliance Review	4/21/2010
QTGA Submission	4/22/2010
QTGA Return	5/6/2010
Compliance Review	6/21/2010
QTGA Submission	7/1/2010
QTGA Return	7/29/2010
Compliance Review	8/18/2010
QTGA Submission	8/19/2010
QTGA Return	9/30/2010
Compliance Review	10/25/2010
QTGA Submission	10/28/2010
QTGA Return	11/24/2010
Compliance Review	12/31/2010
QTGA Submission	1/6/2011
QTGA Return	1/27/2011
Compliance Review	3/29/2011
QTGA Submission	3/31/2011
QTGA Final Approval	5/16/2011
GM Approval	4/18/2011
DDA Final Approval	7/6/2011

POLICY

1. According to the Oklahoma Tribal-State Gaming Compact (Compact), Downstream Casino Resort (DCR) shall ensure that patrons are afforded due process in seeking and receiving just and reasonable compensation arising from a patron's dispute in connection with the play of any Electronic Gaming Machine (EGM) at DCR.
2. The Compact states that the maximum amount of any prize claim shall be the amount of the prize which the patron establishes entitlement to be awarded.

3. A prize claim (pg. 4) shall be filled out by a patron and delivered to DCR within 10 days of the event/dispute that resulted in the prize claim or a claim cannot be made. The date of the prize claim shall be deemed the official filing date of the prize claim notice.
4. DCR shall forward the claim to the Quapaw Tribal Gaming Agency (QTGA) within 48 hours of receiving it.

PROCEDURES

1. Whenever a patron believes they have a legitimate claim for wrongful or non-payment of a possible prize, the EGM Shift Supervisor or above on duty must attempt to resolve the claim. The manner in which this is done depends on the individual circumstances of each "claim". Claims that cannot be resolved immediately on the floor must be attempted to be resolved by following the procedures listed herein.
2. A questionable payout on an EGM can be any type of payout that cannot be verified on the information screens on the EGM. In every case of a questionable payout amount, the EGM Attendant's first step is to call the EGM Shift Supervisor or above and give them all the information received from the patron and the information on the screen of the EGM. The EGM Shift Supervisor or above will determine the appropriate action steps and take over the situation.
3. When ticket problems occur at the Cashier Cage with a patron, the EGM Attendant will contact an EGM Shift Supervisor or above to investigate the problem or claim.
4. On tickets or bills not crediting, where the decision is made to pull the cash can for verification, the EGM Shift Supervisor or above will complete the process for ticket verification as follows:
 - a. Notify the Cage Supervisor or above of the location code and asset number of the EGM.
 - b. The Cage Supervisor or above will notify QTGA, a Security Supervisor or above, and Surveillance.
 - c. The EGM Shift Supervisor or above, QTGA Compliance Agent or above, Cage Supervisor or above, and a Security Supervisor shall remove the cash can from the EGM and take it to the Credit Host office, which is located by the Table Games VIP room and remove the ticket for verification. The patron is allowed to enter the Credit Host office to witness the verification.
 - d. When verified, the EGM Shift Supervisor or above will be responsible to complete the investigation. (For e-drops, please refer to Cage Drop Procedures, Policy #1400.47.01)

5. For all short pays where the ticket or bill is not recovered nor returned to the patron, the EGM Attendant will record the information on a Starter Ticket (pg. 7) to generate an “override” in the system.
6. The EGM Shift Supervisor or above must determine if an override is necessary by comparing the information recorded on the Starter Ticket to an inspection of the actual EGM.
7. All overrides are processed inside the EGM Team Member Fill Jackpot Station (FJP). An EGM Shift Supervisor or above verifies the override. The override is processed by an EGM Attendant with authorization by an EGM Shift Supervisor or above.
8. For a claim of \$20 or less, the EGM Shift Supervisor or above can “short pay” at their discretion.
9. For a claim of more than \$20, a Prize Claim/Dispute form (pg. 4) will be required for ticket claims, bill claims, or any other claim on the machines that has patron money involved with no evidence that there was a malfunction. In all cases, the EGM Shift Supervisor or above will be required to check to see if the ticket or bill in question has been redeemed.
10. On pay and play claims requiring a dispute form, a Prize Claim/Dispute Form (pg. 4) must be filled out completely by the patron and EGM Shift Supervisor or above. When there are disputes with a VGT machine, VGT shall require an additional form (pg. 5) be filled out. A checklist has been provided to ensure all information has been completed (pg. 6).
11. The completed Prize Claim/Dispute form and checklist with all supporting documents must be submitted to the General Manager with a copy to the EGM Director. QTGA shall also receive a copy within 48 hours.
12. Once a Prize Claim/Dispute form is submitted to the EGM Director, the claim must be investigated by DCR management and a report of the investigation presented to the General Manager and QTGA within 72 hours of the filing date of the claim. Contact shall then be made to the patron with the outcome and disposition of the investigation.
13. DCR shall notify the patron within 72 hours to make a decision on the investigation from the filing of the Prize Claim/Dispute form, the results of the investigation, or whether additional time is needed for the investigation. DCR may take up to 30 days if additional information was needed for the investigation.

NOTE: Patrons who are not satisfied with the final disposition as determined by the General Manager have the right to appeal that decision by contacting the QTGA Director. QTGA will review the claim and determine the final resolution to the matter.



PRIZE CLAIM / DISPUTE FORM

Date of Incident _____ Time of Incident _____ am /pm

Date of Report _____ Time of Report _____ am /pm

Type of Incident (Check One Below)

Machine # _____ Denomination _____
Machine ☐ Zone / Location _____ Manufacturer _____
Game Theme _____

Table Game ☐ Game # _____ Limit _____

Poker ☐ Game # _____ Limit _____

Promotion ☐ Promotion Name: _____

Other ☐ Description: _____

Guest Description of Claim: _____

Witness(es) (Contact Information): _____

Guest Signature: _____ Date: _____

Mailing Address: _____ State: _____ Zip: _____

Guest Telephone Number: _____ E-Mail: _____

Employee Signature: _____ Badge #: _____



Original - GENERAL MANAGER
Yellow - GENERAL MANAGER
Pink - GUEST



VGT, Inc. Claim Form

Casino's Claim #: _____

Print Form

Please print all information clearly. Incomplete claims cannot be processed.

A copy of the history tickets must accompany claim form.

Submit by Email

Send completed forms to VGT at: **Fax: 918-512-4799** or Email: to Claims@vgt.net

Date of Claim: _____	Time: _____	Account #: _____
Casino Name: _____	Tribe: _____	
Phone #: _____	Street Address _____	
Fax #: _____	City: _____	State: _____ Zip: _____

Machine #: _____ Serial No.: _____	History Tickets Attached (all 10)? ☐ Yes ☐ No
Claim Amount: _____	Copy of cash out ticket attached? ☐ Yes ☐ No
Name of Game: _____	Picture of the screen attached? ☐ Yes ☐ No
_____	Copy of Payout Ticket attached? ☐ Yes ☐ No
Player's Name: _____	Name of VGT Associate or Casino Management Involved: _____

Eye Witness Testimony of the Incident (usually the player):

VGT Associate or Casino Management Report:

Amount Casino has Paid Customer: _____ Amount Requested from VGT, Inc. _____

Player Signature

Eye Witness Signature

Authorized Casino Staff Signature

VGT, Inc Associate Authorized Signature



SUPERVISOR'S PRIZE CLAIMS CHECKLIST

Employee Handling Claim: _____ Badge #: _____

Employee Signature: _____ Date: _____

Other Employee Involved: _____ Badge #: _____

- ☐ Explain issue to guest to resolve claim or dispute (showed reels/paytables, bingo pattern)
- ☐ Notified and involved TGA Official
- ☐ Name of the TGA Official _____
- ☐ Surveillance notified
- ☐ Photographs provided: Yes _____ No _____ If yes, please attached to report
- ☐ Prize Claim Brochure provided to guest
- ☐ Prize Claim / Dispute form provided to Guest
- ☐ Verify all information on forms
- ☐ Pink (3rd) Copy Given to Guest
- ☐ White / Yellow Copies (1st/2nd) forwarded to General Manager
- ☐ Photocopy forwarded to affected Department Director

Under no circumstances will any employee: 1) Show or present photographs or video images to guests
2) Discuss the availability or lack thereof of any surveillance video



Original - GENERAL MANAGER
Yellow - GENERAL MANAGER
Pink - DEPARTMENT FILE



SLOT STARTER TICKET

41001

☐ Jackpot Payout

☐ Cancel Credit

Date:		Time:	
Slot Machine Number		Shift	Days Swing Grave
Location Number		Booth Window Number	
DENOMINATION			
.01	.02	.05	.25 1.00 5.00 Other _____
No. Coins Played		No. Lines Played	
		Amt. Paid by Machine	
		\$	
WINNING REEL COMBINATION			
Amount of Payout \$			
(PRINT AMOUNT - ALPHA)			
Slot Booth Cashier		License Number	
Slot Att./Tech.		License Number	
Slot Shift Supervisor		License Number	
Slot Shift Manager		License Number	
SECURITY		License Number	

SP 20048

Quapaw Tribal Gaming Agency



Date Received	4/11/11
Comments	
Reviewed By	MK 4/18/11 JB 4/15/11
Approved	Tentative
Not Approved	Final

Policy and Procedure Submission

Policy Name and Number: Verifying Return Cashier Banks Policy #1400.37.01	Department: Cage	Submission Date: 4/7/2011
Narrative Description: To establish policy and procedures to receive returned Cage Cashier banks back into the Main Bank.		DCR/QTGA Tracking: POLICIES & PROCEDURES DDA APPROVED JUL 06 2011

DCR Compliance Authorization

Signature: Stephani Ball 2551

Date: 4/5/11

Department Director Authorization

Signature: M. Ken Ann

Date: 4/5/11

General Manager Authorization

Signature: Steve Jones

Date: 4/10/11

QTGA Authorization

Signature: Barbara Chan

Date: 5/16/11

VERIFYING RETURN CASHIER BANKS	Policy No: 1400.37.01	Issue Date: 5/16/2011
PURPOSE: Establish policy and procedures to receive returned Cage Cashier banks back into the Main Bank.		

DCR Compliance – ITEM Tracking	Date
Issue Date	5/16/2011
QTGA Submission	7/8/2009
QTGA Return	11/6/2009
Compliance Review	6/21/2010
QTGA Submission	6/24/2010
QTGA Return	7/21/2010
Compliance Review	7/28/2010
QTGA Submission	8/5/2010
QTGA Return	8/11/2010
Compliance Review	8/11/2010
QTGA Submission	8/12/2010
QTGA Return	9/1/2010
Compliance Review	9/10/2010
QTGA Submission	9/16/2010
QTGA Return	10/14/2010
Compliance Review	3/25/2011
QTGA Submission	4/7/2011
GM Approval	4/11/2011
QTGA Final Approval	5/16/2011
DDA Final Approval	7/6/2011

POLICY

1. The outgoing Cashier shall count the bank's inventory and enter the amounts in the ABACUS system in the count area of the Casino Cage.
2. If a variance of \$5 or more is found, then the drawer must be recounted by a Cage verifier (Cage Manager, Cage Shift Manager, Cage Supervisor) before the drawer is given to Main Bank.
3. All variances shall be documented, investigated and, if possible, resolved. Shortages and overages in the count from the initial imprest fund received by a Cage Cashier or above shall follow the Cage Variance Policy (#1400.45.01).
4. Upon completion of the balancing process, the bank's inventory shall be given to the Main Bank Cashier along with the Cage Cashier's paperwork. The Cage Cashier shall also return the bank key in Keywatch.

PROCEDURE

1. Cage Cashiers working on the front line of the cage and jackpot window shall return the imprest bank, the closing count sheet and paperwork accumulated during the shift to the Main Bank Cashier.
2. The Main Bank Cashier shall complete an independent count and verification of the bank's inventory and then compare the amounts listed on the closing count sheet.
3. All currency must be counted by denomination. The Main Bank Cashier will use the currency counter to verify each strap in the bank. Unless a Cage Supervisor or above has already verified the straps before the drawer has been given to the Main Bank, the old strap must be broken when it is removed from the currency. Once the strap is verified, it will be thrown away. The Main Bank Cashier will initial, including badge number and date the new strap.
4. Coins are to be counted as rolled and loose coins.
5. Chips will be counted as racked and partial racks. The Main Bank Cashier will verify each full rack by removing one chip and then running a chip down each stack to ensure the rack is full. When \$500 chips are involved, every stack is broken down. Partial stacks will always be broken down.
6. Checks will be totaled by each type and listed on the appropriate lines (pg. 5 identifies different lines). There are several types of checks:
 - a. Personal checks
 - b. Cash advance electronic checks
 - c. Traveler's checks
 - d. Downstream Casino Resort checks
 - e. E-checks
7. Coupons (complimentary slips) will be listed on the appropriate lines. A tape will be run on the coupons, dated and initialed, including badge number by the Main Bank Cashier.
8. The Main Bank Cashier will check the accuracy of the EZ Pay tickets total from the EZ Pay session closer report (pg 4).

9. Jackpot slips shall be added. A tape will be run, dated and initialed including badge number by the Cage Cashier.
10. Gift cards redeemed will be totaled and verified against the appropriate line item.
11. Gift cards sold will be totaled. There are two types that need totaled separately, either sold by cash or sold by credit card/checks.
12. A shift reset will be sent in with the gift cards showing the gift card redeem and sold for the Cashier's shift.
13. Promotional Pay Outs shall be added up and verified against the appropriate line item.
14. The ending inventory total should be the same as the opening imprest total.
15. If the totals are the same, the Main Bank Cashier shall put the inventory items in the appropriate place in the Main Bank and incorporate all the currency and coin into the Main Bank inventory.
16. If the totals are different, the bank will be recounted. If the discrepancy is not found, the Cage Supervisor must be immediately notified.
17. If the totals are still different, the difference is known as a variance and the computer system will print out a variance form for all overages and/or shortages.
18. The Cage Over/Short Voucher (pg 6) contains the following:
 - a. Date & Time
 - b. Name and badge number of Cage Cashier
 - c. Cage Window Location Number
 - d. Amount over/short
 - e. Signature and Badge number line for Cage Cashier
 - f. Signature and Badge number line for Main Bank Cashier
 - g. Signature and Badge number for Cage Supervisor

6/24/2009 2:38:56 PM

v1.9.2

***** Session Closer *****

Session #: 008221
Gaming Day: 6/24/2009
User: Joyce Parker
Workstation: cage07
Opened: 6/24/2009 7:35:58 AM
Closed: 6/24/2009 2:38:55 PM
Tran Count: 43

SP153

Paid Total 4,732.15
Unverified Total 0.00

Session Paid Total 4,732.15

Issued Total 0.00
Void Issued Total 0.00

Session Issued Total 0.00

Net Paid Out 4,732.15

Close Override Amt:

Paid Var: 0.00
Issued Var: 0.00
Void Issued Var: 0.00

0.00

DownStream Casino

-- FINAL DROP --

Date: 06/26/2009

Time: 18:33:47

Beginning Till

60,000.00

Drop From: Cage Window # 4

Cashier: 2047

JUSTIN ADDIS

Item Description	Drop Amnt
Currency \$100	19,700.00 ✓
Currency \$50	100.00 ✓
Currency \$20	5,940.00 ✓
Currency \$10	2,850.00 ✓
Currency \$5	995.00 ✓
Currency \$1	43.00 ✓
Quarters \$ 0.25 Loose	31.25 ✓
Dimes \$ 0.10 Loose	8.70 ✓
Nickels \$ 0.05 Loose	1.50 ✓
Pennies \$ 0.01 Loose	0.48 ✓
eChecks	5,418.00 ✓
Gaming Vouchers - SCANN	14,820.79 ✓
Chips \$ 500.00 - P	500.00 ✓
Chips \$ 100.00 - B	6,500.00 ✓
Chips \$ 25.00 -	975.00 ✓
Chips \$ 5.00 -	185.00 ✓
Chips \$ 1.00 -	28.00 ✓
\$ 0.25 ANTE - Gold	1.00 ✓
Travelers Checks	50.00 ✓
Cash Advance Checks	2,335.00 ✓
Personal Checks	982.00 ✓
-Check Fees-	-30.00 ✓
Comp Tickets	1,145.00 ✓

Drop : 62,020.00
 Cash XFER (deb): 0.00
 Cash XFER (cre): (2,620.00)

Total Drop: 60,000.00
 Till Amount: (60,000.00)

O/S: 0.00

Cashier License/Signature: 2047 JUSTIN ADDIS
Main Bank (Accepted) Lic./Signature
Main Bank (Verified) Lic./Signature
Supervisor / License #

DownStream Casino

OVER /SHORT VOUCHER

Date: 06/27/2009

Time: 18:17:28

Cashier: 2047

ADDIS JUSTIN

Location:

Gage Window # 5

OVER

SHORT

0.30

Cashier License/Signature

2047

ADDIS JUSTIN

Main Bank(Accepted) Lic./Signature

Main Bank(Verified) Lic./Signature

Supervisor / License #

1528

Chips \$ 25.00 -

050.00

Quapaw Tribal Gaming Agency



Date Received	4/21/11
Comments	
Reviewed By	MK 5/03/11 BMS 5/10/11
Approved	Tentative
Not Approved	Final

Policy and Procedure Submission

Policy Name and Number: Remote Deposits - Checks Policy #1400.55.02	Department: Cage	Submission Date: 4/21/2011
Narrative Description: To establish policy and procedures for depositing checks using Remote Deposit for Electronic Check Deposits. This is a revision to #1400.21.01 to change the check dollar amount threshold for dual verification to ensure consistency with other approved Cage policies.		DCR/QTGA Tracking: POLICIES & PROCEDURES DDA APPROVED JUL 06 2011

DCR Compliance Authorization

Signature: Stephen B. 2551

Date: 4/20/11

Department Director Authorization

Signature: M. J. K. Jm

Date: 4/20/11

General Manager Authorization

Signature: Steve Owens

Date: 4/20/11

QTGA Authorization

Signature: Lashana Bellini

Date: 5/16/11

Remote Deposit- Checks	Policy No: 1400.55.02	Issue Date: 5/16/2011
PURPOSE: To establish policy and procedures for depositing checks using Remote Deposit for Electronic Check Deposits.		

DCR Compliance – ITEM Tracking	Date
Issue Date	5/16/2011
Compliance Review	11/12/2009
QTGA Submission	11/12/2009
QTGA Return	11/25/2009
Compliance Revisions based on QTGA Review	11/26/2009
QTGA Submission	12/2/2009
QTGA Return	12/21/2009
Compliance Review	3/23/2010
QTGA Submission	4/01/2010
QTGA Return	4/12/2010
Compliance Review	4/16/2010
QTGA Submission	4/22/2010
GM Approval	4/21/2010
QTGA Final Approval	4/29/2010
DDA Final Approval	5/14/2010
Compliance Revisions to #1400.55.01	4/20/2011
QTGA Submission	4/21/2011
GM Approval	4/20/2011
QTGA Final Approval	5/16/2011
DDA Final Approval	7/6/2011

POLICY

Remote Deposit is a method of depositing checks into the bank by scanning all checks to be deposited for that day and transmitting the checks to the bank. Once the checks have been transmitted, the deposit report can be printed and each check and/or deposit ticket can be viewed or printed. The procedures for processing a remote deposit are as follows:

Preparing and Loading Checks

1. The Cage Supervisor or above will be responsible for submitting checks for deposit at the end of each shift. All checks \$3000 or greater require a “Double” verification from a Cage Supervisor or above.

- a. Log on to the Bank Cash Management Department central web site by using your Login Name and Password.
- b. Prepare the checks before scanning to prevent paper jams inside the scanner by removing all rubber band, paperclips, staples, etc. from the checks.
- c. Align the bottom edges by repeatedly tapping the bottom edge of the checks on a hard surface.
- d. Tap the leading edge of the checks on a hard, flat surface.
- e. Check the bottom and leading edges once more to ensure the checks are aligned.
- f. Checks can be fed one at a time into the scanner or in batches of up to 30.
- g. Insert the checks facing outward from the scanner with the Magnetic Ink Character Recognition (MICR) toward the bottom.
- h. Be sure the leading edge fits between the two raised white lines on the scanner cover.

Scanning the Deposit

1. To scan the checks, click on **“Capture Deposits”**
2. Verify and select the:
 - a. Location – DCR (Downstream Casino Resort)
 - b. Account – (Account number of the deposit)
 - c. Processing Date - (Date deposit is to be processed)
 - d. Amount – (Total amount of the deposit in dollars and cents)
3. Click on **“Create Deposit”**
 - a. At this point a deposit ticket will appear with the total amount of the deposit and the checks are ready to be placed into the scanner.
4. Click the **“Scanning”** button to begin scanning. While scanning, an image of each check will appear.
 - a. Either a green check mark or a red X will appear which determines whether the item was scanned correctly or not.

- b. Items with a red X will need to be corrected.
- c. If the deposit is in balance, a message in green will appear stating **“Deposit is balanced and ready to be released”**.
- d. If the deposit amount is out of balance, verify the dollar amount for each check by clicking on each amount.
- e. If you had to make any changes, the following edit code will appear once you are done editing, **“There are no more errors in the transaction. Do you want to edit the transaction amount?”**
- f. At this point click on the **“YES”** button and the total deposit amount will be corrected automatically.

Deposit Amount

- 1. The deposit amount will appear on the screen. Verify that the amount is correct and click **“OK”**.
- 2. The total deposit slip will appear on the screen and the message will appear **“Deposit is balanced and ready to release”**.
- 3. Click the **“Close”** button to transmit the deposit.

Transmitting the Deposit

- 1. At the close batch screen, choose the **“Release”** option to transmit and click **“OK”**.
- 2. A screen will appear with a report that contains all scanned checks. Verify that the deposit amount is correct before transmitting.
- 3. If the deposit is **incorrect**, click the **“Delete”** key.
- 4. If the deposit is correct, click on **“Transmit”**.
- 5. **Important: An acknowledgement will appear once you transmit correctly.**

Transmitted Deposit

- 1. The depositing bank operations department will review the deposit and post the deposit to the account via ACH (Automated Clearing House) credit. This should take place daily, on working bank days.
- 2. The IBC Bank system shall automatically send a report of the transmitted deposit to Accounting.

Storing of Checks

1. Checks will be stored in the daily accounting boxes in record retention.

User Management- Administrator

1. The Accounting Manager will be responsible for maintaining requests for access with the bank. All terminations/new hire access etc. will be communicated by Information Technology to the Accounting Manager for updating. Each user shall have a unique sign on, which is their individual sign on and password.
2. The Banking administrator will be able to complete the following, with IBC Bank approval.
 - a. Add a user
 - b. Delete a user
 - c. Edit a user
 - d. Change a password - Passwords will be valid for one quarter
 - e. Lock an account
 - f. Unlock an account
 - g. Assign specific tasks to a user

Quapaw Tribal Gaming Agency



Date Received	5/10/11
Comments	
Reviewed By	MC 5/12/11 JB 5/17/11 BWE 5/12/11
Approved	Tentative
Not Approved	Final

Policy and Procedure Submission

Policy Name and Number: Controlled Key Procedures Policy #6320.22.01	Department: Compliance	Submission Date: 5/9/2011
Narrative Description: To establish policy and procedures for controlled keys issued at Downstream Casino Resort (DCR).		DCR/QTGA Tracking: POLICIES & PROCEDURES DDA APPROVED JUL 06 2011

DCR Compliance Authorization

Signature: Stephan B. 2551

Date: 5/6/11

Department Director Authorization

Signature: M. K. Jones

Date: 5/6/11

General Manager Authorization

Signature: Steve Jones

Date: 5/9/11

QTGA Authorization

Signature: Barbara Cellini

Date: 6/16/11

Controlled Key Procedures	Policy No: 6320.22.01	Issue Date: 6/16/2011
PURPOSE: To establish policies and procedures for controlled keys issued at Downstream Casino Resort.		

DCR Compliance – ITEM Tracking	Date
Issue Date	6/16/2011
Compliance Review	3/1/2010
QTGA Submission	3/4/2010
QTGA Return	3/25/2010
Compliance Review	6/21/2010
QTGA Submission	6/24/2010
QTGA Return	7/28/2010
Compliance Review	7/30/2010
QTGA Submission	8/5/2010
QTGA Return	9/1/2010
Compliance Review	9/3/2010, 5/5/2011
QTGA Submission	5/9/2011
QTGA Final Approval	6/16/2011
GM Approval	5/9/2011
DDA Final Approval	7/6/2011

POLICY

The following procedures have been established in order to provide accurate accountability of Downstream Casino Resort (DCR) controlled keys.

PROCEDURES

1. Key Issuance
 - a. Controlled keys are those used for office keys and areas needing some level of control and/or security, but are not sensitive enough for the Key Watch System. All Directors and above will be responsible and accountable for controlled keys issued to their departments.
 - b. When a controlled key is needed, a Key Request Form (pg. 3) must be completed by the individual requesting the key. The form must be approved and signed off by the General Manager, the Assistant General Manager and the Department Director. The CFO's signature is only needed if it is a sensitive key. (To obtain detailed information on sensitive keys, see Sensitive Key Control, policy #6320.16.01.) Once the Key Request Form is signed by the appropriate Team Members, the Key Coordinator shall scan the form and send to the Facilities Locksmith.

- c. The Facilities Locksmith completes the Key Request Form and shall deliver it and the key back to the Key Coordinator who will then contact the Team Member to pick up the key.
 - d. Once the Team Member accepts the key, the Key Coordinator will send the original to Human Resources to be filed in the Team Member's file.
 - e. The Locksmith shall maintain a master list identifying the keys issued and to whom they were issued. The Locksmith shall forward a copy of the master list to the Facilities Coordinator and Key Coordinator.
2. Key Return – Company Separation or Departmental Transfer
- a. When a Team Member is leaving DCR or transferring to a different department, Human Resources shall obtain the Key Request Form from the Team Member's file and verify that the Team Member is returning all controlled keys to Human Resources. It is the Team Member's Department Director responsibility to ensure the Team Member returns the key to Human Resources and signs including badge number the Key Request Form indicating that the key was returned.
 - b. Human Resources shall deliver the keys and the completed Key Request Form to the Key Controller. The Key Controller will then notify the Facilities Locksmith that the key has been received. The Locksmith will then retrieve the key from the Key Coordinator.
 - c. The Facilities Locksmith shall update the master list and provide a revised copy to the Facilities Coordinator and Key Coordinator.
3. Key Return – Interdepartmental Moves
- a. When there is an interdepartmental move, it shall be the responsibility of the outgoing Department Director to obtain the Key Request Form from Human Resources and have the Team Member sign, including badge number, the form indicating the return of the key. The Team Member will then fill out a new Key Request Form for issuance of the new key.



KEY REQUEST FORM

Name _____

Employee ID # _____ Department _____

Key # _____ Sensitive Key _____ Door Key _____

Key Location(s) _____

Key Issue Agreement: In return for the loan of this key, I agree: 1) not to give or loan the key to others; 2) not to make any attempts to Copy, alter, duplicate, or reproduce the key; 3) to use the key for authorized purposes only; 4) to safeguard and store the key securely; 5) to Immediately report any lost or stolen keys; 6) produce or surrender the key upon official request. I also agree that if the key is lost, stolen, or Not surrendered when requested a charge that reflects the cost of changing any and all locks affected may be assessed.

Signature _____ Date _____

Issue type: ☒ Standard
☐ Temporary
☐ Reissue

Reason _____

Signature _____ Date _____
General Manager

Signature _____ Date _____
~~Senior VP Resort Operations~~
Asst. General Manager
Signature _____ Date _____
Department Director

CFO Signature _____ Date _____
(If sensitive key)

OFFICIAL USE ONLY

Date Issued _____

By _____

Control# _____

Entered By _____

KEY RETURN

Return Date _____ BY _____

Return
Reason _____

KEY NOT RETURNED

Lost ☐ Stolen ☐ Broken ☐ Other ☐

Explain circumstances _____

Signature Receipt _____

Quapaw Tribal Gaming Agency



Date Received	5/10/11
Comments	
Reviewed By	mk 5/10/11 JBS/11/11 Bon 5/11/11
Approved	Tentative
Not Approved	Final

Policy and Procedure Submission

Policy Name and Number: Purchasing Policy Policy #6030.10.01	Department: Purchasing	Submission Date: 5/5/2011
Narrative Description: To establish a policy and procedures for the purchasing of goods and/or services.		DCR/QTGA Tracking: POLICIES & PROCEDURES DDA APPROVED JUL 06 2011

DCR Compliance Authorization

Signature: Stephanie B. 2551

Date: 5/4/11

Department Director Authorization

Signature: [Signature]

Date: 5/5/11

General Manager Authorization

Signature: [Signature]

Date: 5/9/11

QTGA Authorization

Signature: [Signature]

Date: 6/16/11

Purchasing Policy	Policy No: 6030.10.01	Issue Date: 6/16/2011
PURPOSE: To establish a policy and procedures for the purchasing of goods and/or services.		

DCR Compliance – ITEM Tracking	Date
Issue Date	6/16/2011
Compliance Review	5/2/2011
QTGA Submission	5/5/2011
QTGA Final Approval	6/16/2011
GM Approval	5/9/2011
DDA Final Approval	7/6/2011

POLICY

The acquisition of goods and services is solely the responsibility of the Purchasing Department of Downstream Casino Resort (DCR), unless specifically exempted by the Downstream Development Authority or the General Manager. Orders not executed by the Purchasing Department shall not be received or paid by DCR.

PROCEDURES

The following procedures shall be followed for the acquisition and payment for goods and services used in the normal course of business.

1. If the purchase request is for \$2,500 or more, the item being purchased has useful life of more than one year, and replaces or improves an existing capital asset, then the requestor must fill out a Capital Expenditure Request form which is defined in the Long Lived Assets, policy #6320.18.01.
2. A properly completed Purchase Requisition Form (pg. 4) detailing all pertinent information must be completed by the requesting Department.
3. If the purchase request is for items that will be purchased on a regular basis (i.e. – Food and Beverage items), then it must be identified as a Blanket Purchase request and be included on a Blanket Purchase Order (pg. 5).
4. The Purchasing Department shall issue a Purchase Order (pg. 5) for those purchases requiring one invoice or covering a single project which are listed on a Purchase Requisition Form. The Purchasing Department shall issue a Blanket Purchase Order for Blanket Purchase Requests covering purchases made during a specific period, which shall allow purchases for up to a total amount. All purchase requests listed on a Purchase Requisition to be placed on a Blanket Purchase Order shall include the following information:

- a. Relevant dates, including either the specific period that the Blanket Purchase Order is good for or the specific start and ending date.
 - b. Specific release limits, i.e., \$3,500/month or \$2,000/release, etc.
 - c. A list of specific individuals permitted to purchase items, release purchases and receive items against the Blanket Purchase Order, including the maximum dollar value each individual is allowed to order, release, or receive.
5. Each Purchase Requisition Form shall include proper authorization signature (s). Authorization levels, at a minimum, are as follows:

Up to \$1,000	Department Director (or Manager)
\$1,000 to \$5,000	Department Director (or Manager) and Assistant General Manager
\$5,000 to \$20,000	Department Director (or Manager), Assistant General Manager, and Chief Financial Officer
\$20,000.01 and above	Department Director (or Manager), Assistant General Manager, Chief Financial Officer, and General Manager
6. Properly approved and authorized Purchase Requisitions shall be faxed to the Purchasing Department, with a hard copy following via inter-office mail.
7. The Purchasing Department shall source goods and services as follows:
 - a. When viable, the Purchasing Department shall seek competitive bids for goods and services to be provided.
 - i. If necessary or appropriate, a scope of work or Request for Proposal shall be provided to each vendor bidding on providing the good or service.
8. After the goods or services have been purchased and delivered/rendered using a standard purchase order, payment shall only occur if an invoice/bill has been received from the vendor and a receiver, provided by the Warehouse is attached or is authorized with an appropriate signature(s). Authorization levels for invoice/bill payment are as follows:

Up to \$1,000	Department Director (or Manager)
Over \$1,000	Department Director and Assistant General Manager
9. Items purchased or released pursuant to Blanket Purchase Orders shall require authorization by a person named on the Blanket Purchase Order. A receiver shall be attached in all cases, attesting to the receipt of the goods or services.

- a. A receiver shall be attached for payment of Food and Beverage invoices. This is a narrow exception to the standard policy.
 - b. Pursuant to the Blanket Purchase Order requirements stated above, only persons listed on the Blanket Purchase Order may approve payments, up to their individual limits.
10. Accounts payable shall forward invoices with no receiver to the appropriate departments for authorization. A department's failure to act in a timely manner may hinder future purchases.

Pg. 1 of Purchase Requisition Form

```

RP2000.2=>          REQUISITIONS ..... *LIVE*.. V8..2          05/03/2011
                     Purchase Requisition Entry
                     Purchase Requisition Header Entry

Requisition Number: 00036214 Date: 05/03/2011 Status: INCOMPLETE
Date Required: 05/04/2011
* Charge To Company: 1 DOWNSTREAM CASINO RESORT
* Charge To Division: 2 RECEIVING/PURCHASING
* Charge To Department: 2 PURCHASING - DEFAULT
Override Accounts: N (Y/N),
Override Account Number:
Job Cost Number:
* Project Number:
Special Project: N (Y/N), Y=project not validated
Close Partial Order: N (Y/N),
Credit Request: N (Y/N),
Ordered By User: MJMONTGOME
Line Items: Net Total: .00

* Press F13 to browse when cursor is in first position of field. More..
F3=Exit, F5=Clear, F7=Print, F8=Edit, F9=Due Dates, F10=Items
F12=Select, F13=Browse, F14=Profile, F15=Remarks,
F16=Comments, F18=Sequence, F22=Final U/D, F24=Delete requisition =>

```

Pg. 2 of Purchase Requisition Form

```

RP2610.1=>          PURCHASING FUNCTIONS          05/03/2011
                     Purchase Line Item Entry

Document#: 00036214 Type: PUR REQ Date: 05/03/2011 Vend: Credit: N
Charge To Dept: 1 2 2 PURCHASING - DEFAULT Buyer Code:
Enter options: 1=Detail, 4=Delete, 6=Descriptions, 8=Taxes/Discounts
Position To Line:
Line * Item# Quantity Price U/M Item Description Net Amount
1
2
3
4
5
6
7
8
9
10

Status: I Totals - Lines: 0 TAX: .00 Amount: .00
* Enter ? in 1st position of item number to browse master file.
Use item detail display to enter and update undefined items.
F3=Exit, F5=Clear, F9=DSC, F10=Detail, F12=Prior, F18=UPC HELP =>
No data available

```

Blanket Purchase Order

DOWNSTREAM CASINO RESORT
REPORT#: RP7230

MATERIALS MANAGEMENT SYSTEM
BLANKET PURCHASE ORDER

DATE: 01/13/2011

VENDOR NAME AND ADDRESS:
V Hicklin Enterprises LLC
E 510 S Kentucky Ave
N Joplin, MO 64801
D
O
R

BPO NUMBER BDCANDY
EXP DATE 08/04/2011
BUYER MJMONTGOME
PAGE 1

FOB.....
SHIP VIA.....
PAYMENT TERMS..... DUE UPON RECEIPT
JOB COST NUMBER.....
PROJECT NUMBER.....

DEPARTMENT AUTHORITY.. N
RELEASE LIMIT..... 6500.00

REVIEW PERCENTAGE..... .00
BLANKET P/O LIMIT..... 78000.00

LINE	ITEM#	ITEM DESCRIPTION	QUANTITY	U/M	PRICE
1	1020180022	CHOCOLATE 3-PIECE SET 42BX/CASE (MARKETING GIVEAWAY) (MARKETING GIVEAWAY)	0	CASE	0.00
			0	BOX	

TOTALS - LINES 1
RELEASES 6
AMOUNT RELEASED 26113.82

Purchase Order

DOWNSTREAM CASINO RESORT
REPORT#: RP7210: STANDARD PURCHASE ORDER

DATE: 03/03/2011

VENDOR NAME AND ADDRESS:
V Amcon Distributing
E 821 E. Commercial
N Springfield, MO 65803
D
O
R

P/O NUMBER 00038546
P/O DATE 03/03/2011
BUYER MJMONTGOME
PAGE 1

SHIP DATE 03/03/2011
REQUIRED 03/04/2011
REQ NBR
MODE 0

SHIP VIA.....
PAYMENT TERMS..... NET 30 DAYS
JOB COST NUMBER.....
PROJECT NUMBER.....
CHARGE DIVISION..... INVENTORY
CHARGE DEPARTMENT..... TOBACCO INVENTORY

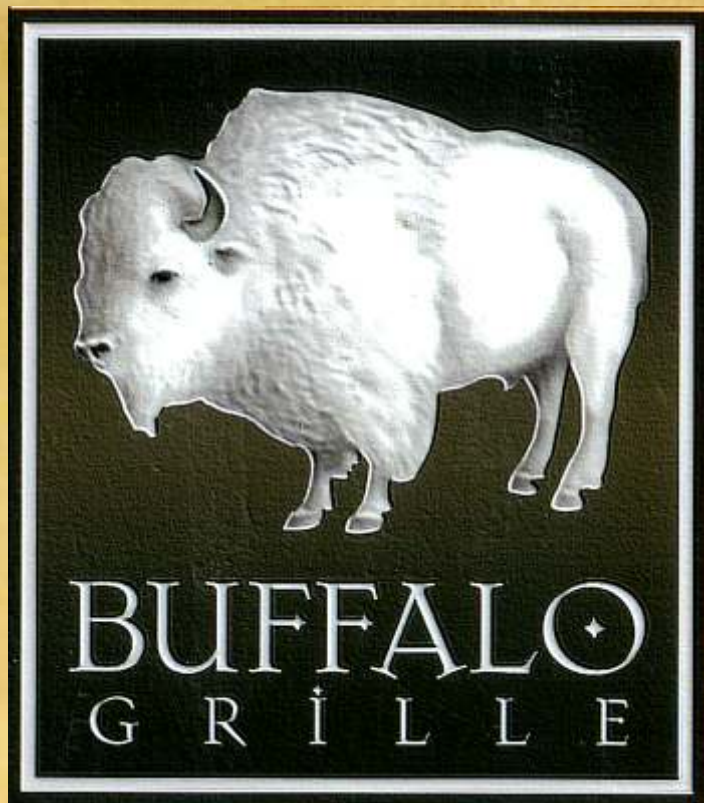
SHIP TO LOCATION:
RECEIVING - MAIN DOCK
69300 EAST NEE ROAD

QUAPAW OK 74363

CONFIRMING ORDER..... N
CREDIT REQUEST: N

LINE	ITEM#	ITEM DESCRIPTION	QUANTITY	U/M	PRICE	EXTENSION
1	4070100012	TOBACCO WINSTON LT KING BOX (112740)	4	CRTN	36.25	145.00
2	4070100031	TOBACCO CAMEL LT KING BOX (111910)	10	CRTN	36.25	362.50
3	4070100036	TOBACCO KOOL FF BOX KING (112400)	6	CRTN	36.25	217.56

TOTALS - LINES 3
GROSS AMOUNT 725.06
FREIGHT & MISC .00
TAX AMOUNT .00
DISCOUNT AMOUNT .00
NET AMOUNT 725.06



appetizers

Spinach & Artichoke Dip

A blend of cheese, spinach and roasted artichokes topped with tomatoes & served with bread rounds 6.95



Chili Cheese Fries

Fries topped with homemade 13-pepper chili, cheese, bacon and jalapenos Full 6.95 Half 4.95

Onion Ring Tower

Beer battered onions stacked high & served with honey mustard for dipping 6.95



Sampler Platter

Pick three favorites served with dipping sauces. Chicken tenders, fried cheese sticks, spinach & artichoke dip, onion rings, chili cheese fries or steak fingers 12.95

Steak Fingers

Hand breaded steak fingers served with jalapeno ranch dressing 8.95

Mozzarella Cheese Sticks

Fried mozzarella cheese served with marinara sauce 6.95

Chips & Salsa 3.95

Chips & Queso 5.95

Chicken Quesadilla

With onions, peppers, chicken and melted cheeses. Served with Pico de Gallo and sour cream 8.95

Chicken Tenders

Hand breaded chicken fried crispy & served with choice of honey mustard, ranch or BBQ sauce 6.95

Buffalo Chicken Wings

Jumbo wings tossed in buffalo sauce & served with blue cheese dressing 7.95

Southwestern Nachos

Corn tortilla chips topped with black beans, melted cheeses, onions and peppers. Served with sour cream and Pico de Gallo.

Full 8.95 Half 6.95

Add chicken or beef 2.00

Shrimp Skewer

Six large marinated, grilled shrimp served with jalapeno ranch and a lemon wedge 7.95

Brautzel Bites

Spicy brauts wrapped in a pretzel and served with mustard dipping sauce 6.95 Add our special cheese sauce for 1.00 more



BBQ Chicken Salad

BBQ chicken, diced tomatoes, sweet corn, jicama, cilantro, green onion, black beans, basil and jack cheese tossed in avocado ranch dressing and drizzled with BBQ sauce 8.95

Cobb Salad

Chopped lettuce topped with Boar's Head ham, turkey and bacon, blue cheese crumbles, diced egg, cucumbers, tomatoes and avocado served with choice of dressing 9.95



Orchard Salad

Apples, strawberries, red onion, oranges, tossed with herb citrus dressing topped with Boar's Head ham and sugared pecans 8.95

House Salad

Chopped lettuce topped with tomatoes, red onions, cucumbers and croutons served with your choice of dressing 5.95

Caesar Side Salad

Romaine lettuce tossed with a traditional Caesar Dressing topped with homemade croutons and grated Parmesan cheese 3.95

Side Salad

Chopped lettuce topped with tomatoes, red onions, cucumbers and croutons served with choice of dressing 3.95

Soup of the Day

Our special blend of soup, made from scratch daily Bowl 2.95 Cup 1.95

Chicken Tortilla Soup

Bowl 2.95 Cup 1.95

13-Pepper Chili

Bowl 3.95 Cup 2.95

Chicken Caesar Salad

Romaine lettuce tossed with a traditional Caesar dressing topped with homemade croutons, grated Parmesan cheese and grilled chicken. 8.95 Substitute shrimp for an additional 2.00

Chicken Tender Salad

Chopped mixed lettuce topped with chicken tenders, tomatoes, red onion, cucumbers, mixed cheese and homemade croutons. Served with choice of dressing 8.95



Chinese Chicken Salad

Crisp Iceberg lettuce, cabbage, green onions, carrots, cilantro, grilled chicken and crispy wontons tossed in sesame dressing and topped with toasted sesame seeds 8.95

Dressing Choices:

Thousand Island, Bleu Cheese, Creamy Italian, Ranch, Jalapeno Ranch, Honey Mustard, French, Herb Citrus, Asian or Oil and Vinegar



SOUPS and Salads





Cheeseburger

½ pound Black Angus ground beef topped with lettuce, tomato, red onion, your choice of cheese, and served with French fries on the side 7.95

Bison Burger

½ pound of 100% Lean Ground Buffalo topped with lettuce, tomato, red onion, and served with French Fries on the side 9.95



Kobe Burger

½ pound Kobe ground beef topped with lettuce, tomato, red onion, your choice of cheese, and served with French fries on the side 11.95

Patty Melt

½ pound Black Angus ground beef topped with caramelized onions and Swiss cheese served with French Fries on the side 7.95



Smokehouse Burger

½ pound Black Angus ground beef topped with lettuce, tomato, crispy onions, melted Tillamook cheddar cheese, Boars Head Bacon, covered in BBQ sauce, and served with French Fries on the side 8.95

Turkey Burger

½ pound ground turkey topped with lettuce, tomato, crispy onions, cranberry ketchup, and served with sweet potato fries on the side 8.95

Mushroom Swiss Burger

½ pound Black Angus ground beef topped with lettuce, tomato, red onion, sauté mushrooms, melted Swiss cheese, and served with French fries on the side 8.95.

b u r g e r s

S a n d w i c h e s

Reuben

Thin sliced Boars Head Corned Beef with sauerkraut, Thousand Island dressing, melted Swiss cheese on Marble rye bread served with French fries on the side 7.95

Grilled Chicken Sandwich



On a pretzel roll with lettuce, tomato, avocado, aioli, and melted pepper jack cheese served with French fries 7.95

Winners Club

Our famous triple-Decker served with Boars Head Turkey, Ham, and Bacon, Lettuce, tomato, and mayonnaise on toasted Seven Grain Bread with French fries on the side 7.95

Cheese Steak

Thinly sliced Ribeye beef cooked with sauté onions, peppers, and mushrooms, and melted provolone cheese served on a French roll with French fries on the side 8.95

Pulled Pork Sliders



Slow roasted pork shoulder with coleslaw and BBQ sauce served with French fries on the side 8.95

Classic Deli Sandwich

Comes with choice of one Boars Head meat (Maple Ham, Oven-Roasted Turkey, or Bacon) Choice of Bread (white, wheat, Seven Grain, or Sourdough) Served with Lettuce, tomato, onion, and mayonnaise served with French fries on the side 6.95

Downstream Croissant

Boar's Head Turkey and bacon, lettuce, tomato, onion, avocado, provolone cheese, and mayonnaise on a toasted croissant served with French fries on the side 7.95

f l a t b r e a d

p i z z a



Roasted Artichoke & Spinach

Crispy flatbread topped with spinach, roasted artichokes, mozzarella cheese, parmesan cheese, tomatoes, and a spinach & artichoke sauce 5.95

BBQ Chicken

Crispy flatbread topped with grilled chicken, BBQ sauce, red onions, mozzarella cheese, tomatoes, and cilantro 5.95

Tomato Mozzarella

Crispy flatbread topped with fresh tomatoes, tomato sauce, mozzarella cheese, parmesan cheese, and basil 5.95



Hawaiian

Crispy flatbread topped with tomato sauce, mozzarella cheese, pineapple chunks, and ham 5.95



entrees

Chicken Parmesan

Italian Herb-breaded Chicken Breast served with Linguini pasta and topped with homemade marinara sauce and parmesan cheese served with garlic bread 11.95



Cajun Chicken Pasta

Blackened chicken served over Linguini pasta tossed in Alfredo sauce topped with fresh tomatoes and green onions served with garlic bread. 11.95
Substitute blackened shrimp for 2.00 more

Fish & Chips

Cod filets dipped in our special beer batter served with French fries and tartar sauce 11.95



BBQ Chicken

Oven baked leg and thigh pieces served with baked beans, coleslaw and cornbread 9.95



Pot Roast

Slow roasted pot roast served with our old-fashion gravy, roasting vegetables, mash potatoes, and cornbread 9.95

Catfish

Catfish hand breaded and cooked to order served with coleslaw, French fries, tartar sauce, and a roll 9.95

Baby Back Ribs

Slow smoked baby back ribs basted in BBQ sauce served with baked beans, coleslaw, and cornbread Full 19.95
Half 14.95



BBQ Platter

Choice 1/2 rack Ribs, BBQ chicken, and BBQ shrimp served with baked beans, coleslaw, and cornbread
Choose three for 19.95



Fajitas

Choice of chicken, steak, or combination served on a hot Cast Iron skillet with sauté onions and peppers with warm tortillas, sour cream, mixed cheeses, Pico de Gallo, and shredded lettuce 11.95.



Add a marinated shrimp skewer to any of our steaks for 3.95 more.



12oz Ribeye

USDA choice cut Ribeye, cooked to perfection, served with mashed potatoes and vegetable of the day, with your choice of a roll or cornbread 19.95

10oz Sirloin

USDA choice Sirloin, cooked to perfection, served with mash potatoes and vegetable of the day, with your choice of a roll or cornbread 15.95



steaks

Any one side can be substituted for no charge on any item with the exception of Loaded Potatoes and Onion Rings which is an additional 2.00 charge.

Baked Potato	2.95
Loaded Baked Potato	3.95
Mash Potatoes	1.95
Loaded Mash Potatoes	3.95
Coleslaw	1.95
Potato Salad	1.95

Mac & Cheese	2.95
French Fries	1.95
Sweet Potato Fries	1.95
Onion Rings	3.95
Homemade Chips	1.95
Vegetable of the Day	1.95



Consuming raw and/or undercooked foods may increase the risk of foodbourne illness

sides

breakfast

classics

Heart-Smart

Scrambled egg beaters served with sliced tomatoes, cottage cheese, and multi-grain toast 7.95

The Downstream Breakfast

Two eggs any style, includes choice of bacon, sausage, smoked pitt ham, or turkey sausage with hash browns or grits, and choice of toast, comes with chilled juice, coffee, tea, or milk 7.95

Biscuits and Sausage Gravy

Two homemade biscuits and sausage gravy 6.95

The High Stakes Breakfast Burrito



A large tortilla filled with diced sausage, onions, peppers, mixed cheese, and scrambled eggs, topped with queso sauce and black olives, served with salsa and sour cream 8.95

Steak and Eggs

10 oz sirloin and two eggs any style; includes your choice of toast and hash browns or grits 13.95



The Downstream Omelette

Choice of four of the following ingredients: Diced ham, bell peppers, chopped bacon, diced tomatoes, diced onions, mushrooms, sausage, jalapenos, black olives, avocados, and choice of cheese: American, swiss, pepper jack, or cheddar, served with choice of toast, with bacon, sausage, smoked pitt ham, or turkey sausage, and hash browns or grits 9.95

California Omelette

Chopped bacon, avocado, black olives, tomatoes, pepper jack cheese, onions, and peppers, served with choice of toast, with bacon, sausage, turkey sausage, smoked pitt ham, and hash browns or grits 10.95

Ham and Cheese Omelette

Smoked pit ham with choice of American, pepper jack, Swiss, or cheddar cheese, served with choice of toast, and bacon, sausage, turkey sausage, or smoked pit ham 8.95

Denver Omelette

Diced ham, bell peppers, and onions, with your choice of American, Swiss, cheddar, or pepper jack cheese, and choice of toast, hash browns or grits. 9.95



Southwestern Omelette

Diced seasoned chicken, onions, peppers, and jalapenos, with pepper jack cheese, includes choice of toast, choice of bacon, sausage, turkey sausage, or smoked pitt ham, and hash browns or grits 9.95

omelettes

from the griddle

from the bakery

Buttermilk Pancakes

Three fluffy buttermilk pancakes served with whipped butter and syrup 5.95

Short Stack 3.95 add pecans for .95

French Toast

Three pieces of lightly battered Texas Toast topped with Powdered sugar and served with whipped butter and syrup 5.95



Danish

Cheese or raspberry 2.95

Bagel with Cream Cheese

Plain or blueberry 2.95

Muffins

Blueberry, Banana nut, or English 1.95

sides

Oatmeal

Served with 2% or whole milk, brown sugar, and whipped butter 3.95

Toast

White, Wheat, Sourdough, Rye, Multi-grain, or Texas Style. 1.95

Bowl of Grits

Served with whipped butter. 3.95

Bacon

2.95

Sausage

2.95

Turkey Sausage

2.95

Smoked Pitt Ham

2.95

Hash Browns

1.95

Biscuit w/ Sausage Gravy

3.95

Sausage Gravy

1.95

Grits

1.95

Fruit Bowl

4.95



HA-WAY!

Welcome to the land of the O-Gah-Pah- The Downstream People, the Quawpaw Tribe. We are so pleased to share our wonderful resort with you. Along with all of the members of the Quawpaw Tribal business Committee, I hope your experience at Downstream Casino Resort is excellent and you come away with some appreciation for our rich culture and history during your visit.

The Quawpaw Tribe is the most southern of all Sioux Tribes, a buffalo hunting people who lived for centuries along the Mississippi River. The O-Gah-Pah has a long recorded history dating back to 16th century contact with Spanish and French explorers and missionaries. With several villages located along the Mississippi, Saint Francis and Arkansas Rivers in Arkansas and Tennessee, the O-Gah-Pah people were fierce warriors and talented statesmen who maintained strategic control of the lower mid American waterways and trade.

The O-Gah-Pah were very talented pottery artisans. The vessels and pots made by the Tribe have been found across the United States and were a valued trade good in the pre-colonial America. The O-Gah-Pah also have been successful agronomists throughout the Tribe's history.

Beginning with the Louisiana Purchase in 1803, life for the O-Gah-Pah began to dramatically decline. Between 1818 and 1834, the O-Gah-Pah people were forced to move to their current location in northeastern Oklahoma. In their new homeland, farming and livestock production were part of everyday life. In the late 1890's and early 1900's, lead and zinc were discovered on the Quawpaw Reservation- leading to a tremendous era of ore production and resource exploitation managed by the federal government on behalf of the Indian people.

Today, the O-Gah-Pah people have thrived and have grown to its current population of approximately 3,500. The O-Gah-Pah have tremendous opportunity and responsibility, managing the natural resources left damaged by the archaic governmental mining management and making the most of what is available to our people through the Indian Gaming Regulatory Act.

There is incredible excitement and a true sense of gratitude on the Quapaw Reservation. It is a pleasure and honor for us to have this great land and this spectacular new resort. From our hearts, we wish you a pleasant and fulfilling visit.

*John L. Berrey
Hum-Buh-Gah-Kah (Big Daylight)
Chairman, Quawpaw Tribe*



DOWNSTREAM CASINO RESORT
TUITION REIMBURSEMENT PROGRAM

Downstream Casino Resort is pleased to offer a Tuition Reimbursement Program for approved educational classes, certification and diploma/GED testing, and other specific educational activities. The objective is to improve team member skills and knowledge through pursuit of diploma, degree or certification that will enhance the team member's ability to fulfill the requirements of his/her present position or to better prepare him/her to assume responsibilities of promotional opportunities with DCR or the Quapaw Tribe.

Tuition reimbursement for approved educational classes, certification and diploma/GED testing and/or other specific educational activities will be allowed up to but not to exceed a maximum of \$1,200 per team member per fiscal year. Team Member is responsible for all costs exceeding allowed maximum. Costs cannot be carried over to next fiscal year unless they fall within the 60 days allowed following successful completion of course/testing.

Eligibility:

To be eligible to make application for tuition reimbursement under this program, a team member must:

- *Be a full time team member in active service; not on leave, and in good standing.
- *Have completed one year of service
- *Be an active team member when the course is completed and grade has been delivered.

Team Member must obtain pre-approval for tuition reimbursement under this program. To do so, team member must complete and return to the Human Resources Department a "Request for Tuition Reimbursement" form (form can be obtained from Human Resources Department). If and when, course, certificate/diploma testing is pre-approved, this form will also serve as a request for payment form at the conclusion of the course/test. Pre-approval will be recommended by Human Resources, with confirmation by Team Member's Department Director.

Upon completion of the pre-approved course, the team member must submit a copy of the "Request for Tuition Reimbursement" form to the Human Resources Department, along with an official transcript of grades (or certificate/diploma proof of passing score), and proof of payment. Proof of payment can be established by either a bursar's receipt or a copy of canceled check or credit card receipt. Request for reimbursement must be initiated within sixty (60) days following successful completion of course/testing.

DCR is will reimburse team members for tuition expenses, certificate/diploma testing expenses only. Team member is responsible for related expenses such as books, fees, parking, etc.

Maximum Reimbursement:

For an "A" grade, DCR will reimburse 80% of approved tuition cost/certification testing;

For a "B" grade, DCR will reimburse 60% of approved tuition cost/certification testing;

For a "C" grade, DCR will reimburse 40% of approved tuition cost/certification testing;

No reimbursement will be allowed for grades lower than a “C” grade.

DCR agrees to reimburse for courses, certifications and testing, for numerical equivalents of a letter grade, provided DCR receives – what it considers in its sole discretion to be – adequate assurances from the accredited institution that the numerical grade is equivalent to a letter grade. (i.e., 90%= A; 80%=B/70%=C)

DCR will reimburse team members for courses in which the team member can receive a grade of only “pass” or “fail” if no other grade option is available for the course/diploma/certification. (pass pays at 80%).

Both accredited on-line (e-learning) as well as physical classroom training/testing are acceptable for submission for review under the parameters of this program. All courses, certificate/diploma testing MUST be taken outside normal working hours and off the clock unless otherwise specified by the Director and General Manager.

OKDHS Child Care Provider Contract

- Contracts are approved or denied by staff in the State Office Family Support Services Division child Care Subsidy Section.
- By signing the Child Care Provider Contract to receive child care subsidy, you grant OKDHS certain permissions to verify that the conditions of the contract are being met.
- At OKDHS, it is the responsibility of the Office of the Inspector General (OIG) to conduct child care related audits.
- All contracted child care providers are subject to being audited with or without notice. You and your staff must cooperate with OIG staff if your facility is selected for audit.
- It is a felony if the child care provider fraudulently presents a claim to the state, either electronically or on paper. Each claim for each recipient filed within a claim month can constitute one count. Each count is punishable by a fine not to exceed \$10,000, imprisonment not to exceed two years – or both
- Office of Inspector General also conducts child care investigations.
- Investigations are conducted to make sure contract requirements about maintaining a drug-free workplace and usage of EBT cards are being upheld.
- You and your staff are responsible for knowing and complying with the policy and procedures (within the OKDHS Handbook)
- By contracting with OKDHS you are agreeing to Use the Child Care Electronic Benefit Transfer system
- Both you and the parent must ensure the parent accurately enters attendance info into the POS. Errors in attendance may require you to pay OKDHS back for overpayments and a pattern of errors will lead to your contract with OKDHS being cancelled.
- You must agree to keep accurate business records. You must make sure attendance information and payments made by OKDHS are accurate.
- All manual claims records must be retained for 3 years or until resolution of pending legal issues. Throughout that time they must be made available to any OKDHS auditors, investigators or other reps of the agency who request them.
- You must notify FSSD Child Care section at least 30 days before any major change in your business – including location, business entity, facility status, ownership, closing the business.
- Additional requirements are agreed to when you sign the OKDHS contract to receive subsidy payments –
- you agree that you will not charge a discriminatory rate, nor will you violate anyone's civil rights
- you agree to maintain a drug-free environment at your facility
- You agree to allow parents and OKDHS staff unlimited access to your child care facility during business hours.
- You agree to make the facility records available and accessible to OKDHS at any time, with or without notice, for OKDHS' use in inspecting, monitoring, evaluating and auditing compliance with the terms of the contract.
- EBT requires an account at a financial institution so electronic payment can be made.









