

Downstream Authority of the Quapaw Tribe of Oklahoma Regular Meeting
July 27, 2011

Meeting Called to Order:

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
Steve Drewes/ Ernie Caruthers/ Alan Mauk

Land Plan

- Keith Franklin
- Discuss walking trail at Casino
- Presentation attached

JCJ

- C Store and Hotel expansion review
- CStore
 - o Macadoodle like liquor store
 - o No seating
 - o 6-8 pumps
 - o RV & Truck Parking
 - o Plan in Place for OIGA
 - o Drawings complete by Mid –September
 - o General discussion of site
- Hotel
 - o General discussion
 - o Presidential/hospitality suite
 - o 6 floors
 - o Spa – 4 treatment rooms, reception, m/w locker
 - o Valet parking 300 spots
 - o Indoor pool
 - o Housekeeping closets on floors
 - o Laundry chute
 - o Meeting space
 - o Current front desk
 - o Lounge/bar in part of Buffalo Grille
 - o Ground breaking in the Spring
 - o Maintain current finishes
 - o Non-smoking in new hotel

General Manager

- Polices

- o 1200.27.01 – DCR EGM Software Control

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 6230.05.03 – Winner's ticket policy – cash

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 1400.43.02 – Dealer 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 1400.64.02 – Toke Procedures for Poker Dealers

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 1400.75.01 – Casino Chips into Inventory

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 6320.15.01 – Universal ID Acceptance Policy

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 6320.24.01 – Controlled Access Policy

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 7000.01.02 – Team member gaming policy

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 7400.09.02 – Bans

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.

Donations

- Eagle Creek Ladies Golf – 2 stay and play packages, free play, gift bag items - YES
- Dear Creek Dawgs, youth football team (gaming vendor) – silent auction item - YES
- Crystal Whitely fundraiser, silent auction item - YES
- Joplin Teacher Getaway - Saturday night stay with dinner - YES
- Don Lansaw Memorial Benefit (tornado victim) - room, dinner, and concert tickets for 2 - YES
- Ozark Presbyterian Church in Ozark – Prize two hotel rooms and golf for 4 - YES

- University of Arkansas Sports Hall of Honor golf tourn - \$1600 – golf for 4, and table of 8 at banquet – Sept 2 - YES
- Big Brothers Big Sisters (Norman) – “The Big Taste” at Belmar Country Club - two night stay and dinner – YES

Adjourn 3:05pm

Quapaw Tribal Gaming Agency



Date Received	7/7/11
Comments	
Reviewed By	MC 7/19/11 JB 7/18/11 BA 7/11/11
Approved	Tentative
Not Approved	Final

Policy and Procedure Submission

Policy Name and Number: <i>Bans</i> <i>Policy #7400.09.01</i>	Department: Security	Submission Date: 07/07/2011
Narrative Description: To establish policy and procedures for banned persons. This is a revised version based on QTGA comments provided to us on 6/16/2011.		DCR/QTGA Tracking: POLICIES & PROCEDURES DDA APPROVED JUL 27 2011

DCR Compliance Authorization

Signature: Stephani B. 2551

Date: 6/27/11

Department Director Authorization

Signature: [Signature] 622

Date: 7/5/11

General Manager Authorization

Signature: [Signature]

Date: 7/7/11

QTGA Authorization

Signature: [Signature]

Date: 7/20/11

Self Banned or Evicted Patrons	Policy No: 7400.09.01	Issue Date: 7/20/2011
PURPOSE: To establish a policy and procedures for banned persons.		

DCR Compliance – ITEM Tracking	Date
Issue Date	7/20/2011
Compliance Review	5/9/2011
QTGA Submission	5/11/2011
QTGA Return	6/16/2011
Compliance Review	6/16/2011
QTGA Submission	7/7/2011
QTGA Final Approval	7/20/2011
GM Approval	7/7/2011
DDA Final Approval	7/27/2011

POLICY

The Downstream Casino Resort (DCR) is all about fun, however there will be times when someone goes beyond good behavior, therefore DCR reserves the right to ban individuals for any act it deems inappropriate.

PROCEDURES

BANS IN GENERAL

1. All cause bans, requests for bans, 24 hour bans and self bans will be completed at the discretion and direction of the Security manager/supervisor on duty. Bans may be requested by any department, member of management, general management or the DDA.
2. If Security or management bans someone, Surveillance will be notified so that they may capture a photo of the individual if applicable.
3. If someone is going to be banned for more than 24 hours, then a copy of their picture I.D. will be taken and forwarded with the ban request to the Director of Security.
4. The Security Officer will complete an incident report and pass it on to the Security manager/supervisor on duty for review.
5. All persons who are banned from DCR will also be banned from the Quapaw Casino. Those persons banned from the Quapaw Casino will also be banned from DCR.
6. If Security is going to recommend a ban longer than 24 hours, they will complete an incident report along with a recommendation on the length and reason for the ban. The report will be forwarded to the Director of Security for processing.

7. The Director of Security will compile the information and present it to the General Manager for a final decision on the ban. If the banned person wishes to appeal the ban they may do so in writing to the General Manager, if they are not satisfied with the response from the General Manager they may appeal their case to the Quapaw Tribal Gaming Agency (QTGA).
8. If an individual decides to ban themselves for a certain amount of time from DCR, that individual will fill out a witness statement explaining why they want to be banned and they will provide a photo I.D. card. A Security Officer will take the statement; the security officer will call Surveillance and have the individual's picture taken. The Security Officer will make a copy of the picture I.D. The witness statement, copy of the I.D., and the surveillance photo will be forwarded as a packet to the Director of Security for processing.
9. QTGA may also ask for someone to be banned pending a QTGA investigation.

BAN PROCESS

Bans may occur two different ways, they may be bans for cause based on criminal activity, or disruption to business norms, or they may be self exclusions for problem gamblers. Both forms of ban require reporting through the Security Department, which is then presented to the General Manager to concur or not concur. The process for these two types of bans is as follows:

Self Bans

1. Anyone wishing to do a self exclusion, for whatever the reason, must present themselves in person with photo identification to the Security Department.
 - a. The individual will be interviewed by a Security Officer to ensure that they fully understand the implications and restrictions placed on them by self-banning.
 - b. A photograph will be taken of the individual, along with the collection of their personal information including; full name, date of birth, current address and phone number for processing.
 - c. Each individual will be given a flyer related to problem gambling before they leave the facility.
 - d. The interviewing officer will complete a self ban form and incident report related to this request. All of the documentation will be presented as a packet to the Director of Security. This information will then be forwarded to the General Manager for their signature.
 - e. When all of the forms have been processed they will be turned over to the Security Administrative Assistant for distribution of required information to the QTGA, Compliance Department, Players Club, Quapaw Casino, Surveillance, and the Security ban books.
 - f. The term of the ban will be enforced until such time as the ban expires or an appeal is successfully made to the General Manager and QTGA to lift the restrictions.

- g. The Security Department Administrative Assistant will send out a certified letter to the patron advising them that the ban is in effect, and explain to them the process for appealing their self exclusion. When notice of the ban is not accepted by the individual through certified mail, they may be personally served should they return to DCR property.
- h. All original ban documentation will be housed in the security department.

Cause Bans

1. Anyone may be excluded from all or any portion of DCR with or without cause. A full property ban also excludes the recipient from any Quapaw gaming facility.
 - a. A photograph will be taken of the individual, along with the collection of their personal information including; full name, date of birth, current address and phone number if they are present.
 - b. The interviewing officer will complete a ban request form and incident report related to this incident. All of the documentation will be presented as a packet to the Director of Security. This information will then be forwarded to the General Manager for his/her signature.
 - c. When all of the forms have been processed they will be turned over to the Security Administrative Assistant for distribution of required information to the QTGA, Compliance Department, Players Club, Quapaw Casino, Surveillances, and the Security ban books.
 - d. The term of the ban will be enforced until such time as the ban expires or an appeal is successfully made to the General Manager and QTGA to lift the restrictions. If the ban is solely an exclusion from the DCR Hotel, the only appeal available will be to the General Manager of DCR.
 - e. The Security Department Administrative Assistant will send out a certified letter to the patron advising them that the ban is in effect and explain to them the process for appeal. When notice of the ban is not accepted by the individual through certified mail, they may be personally served should they return to DCR property.

24 Hour Bans

1. Any security officer in a supervisory position has the authority to ban anyone from this facility for a period of 24 hours.
2. Anytime a 24 hour ban is issued by a member of the Security Department an incident report shall be completed detailing the reasons for the ban.
3. Should it be deemed necessary to ban the patron for an extended period of time, the above mentioned process will be followed.

Quapaw Tribal Gaming Agency



Date Received	6/20/11
Comments	
Reviewed By	MLC 6/29/11 B 6/28/11 3m 7/5/11
Approved	Tentative
Not Approved	Final

Policy and Procedure Submission

Policy Name and Number: Casino Chips Into Inventory Policy # 1400.75.01	Department: Cage	Submission Date: 06/09/2011
Narrative Description: To establish a policy and procedures for the receipt of Casino Chip shipments and to ensure that the recorded amounts are accurate and properly supported. This is a revised version based off QTGA comments provided to us on 05/11/2011.		DCR/QTGA Tracking: POLICIES & PROCEDURES DDA APPROVED JUL 27 2011

DCR Compliance Authorization

Signature: Stephanie Ball 2551

Date: 6/7/11

Department Director Authorization

Signature: MLC

Date: 6/9/11

General Manager Authorization

Signature: Steve Drews

Date: 6/12/11

QTGA Authorization

Signature: Shelia

Date: 7/20/11

CASINO CHIPS INTO INVENTORY	Policy No: 1400.75.01	Issue Date: 7/20/2011
PURPOSE: To establish policy and procedures for the receipt of Casino Chip shipments and to ensure that the recorded amounts are accurate and properly supported.		

DCR Compliance – ITEM Tracking	Date
Issue Date	7/20/2011
QTGA Submission	7/22/2009
Compliance Review	4/2/2010
QTGA Submission	4/8/2010
QTGA Return	4/15/2010
Compliance Review	4/20/2010
QTGA Submission	4/22/2010
QTGA Return	4/29/2010
Compliance Review	5/10/2010
QTGA Submission	5/10/2010
QTGA Return	5/27/2010
Compliance Review	6/29/2010
Egghart and Assoc. Approval	6/29/2010
QTGA Submission	7/1/2010
QTGA Return	7/28/2010
Compliance Review	7/30/2010
QTGA Submission	8/5/2010
QTGA Return	8/11/2010
Compliance Review	8/11/2010
QTGA Submission	8/12/2010
QTGA Return	9/16/2010
Compliance Review	9/30/2010
QTGA Submission	10/7/2010
QTGA Return	10/19/2010
Compliance Review	3/25/2011
Compliance Review	4/15/2011
QTGA Submission	4/21/2011
QTGA Return	05/11/2011
Compliance Review	06/02/2011
QTGA Submission	06/09/2011
GM Approval	6/17/2011
QTGA Final Approval	7/20/2011
DDA Final Approval	7/27/2011

POLICY

According to the Quapaw Tribal Internal Control Standards for Gaming Operations, Downstream Casino Resort (DCR) shall establish and comply with procedures for the receipt, inventory, storage, and destruction of gaming chips and tokens.

RECEIPT OF CASINO CHIPS

1. All chip orders must be requested by the Table Games Director or above and approved by the Chief Financial Officer or above. The Table Games Department shall notify Warehouse, Security, Quapaw Tribal Gaming Agency (QTGA), and Income Audit of the upcoming chip shipment.
2. A shipment of DCR chips shall arrive at the Administration building loading dock. Once the Warehouse Attendants have been notified of a chip receipt they will immediately notify Security Dispatch to send a Security Supervisor or above.
3. The Warehouse Attendant and the Security Supervisor or above will bulk verify the cases to the packing slip. Both the Warehouse Attendant and Security Supervisor or above will sign their signature and badge number on the electronic delivery receipt, which then releases the driver.
4. The Warehouse Attendant will place the chip cases under camera view. The Security Supervisor or above will be responsible for securing the chip shipment received.
5. The following individuals must be present to receive the shipment of DCR chips:
 - a. Income Audit Lead or above;
 - b. Quapaw Tribal Gaming Agency (QTGA) Compliance Agent or above;
 - c. Cage Supervisor or above.
 - d. Security Supervisor or above.
6. The Cage Supervisor or above shall arrive with a lockable cart to transport the chips from the warehouse to the Soft Count room.
7. The locked transport cart shall be moved to the Soft Count Room by the Cage Supervisor or above and escorted by QTGA, Income Audit and a Security Supervisor or above. Warehouse may assist with the transport if necessary.
8. The Security Supervisor shall obtain the Soft Count Room key from the Keywatch system and notify Surveillance upon entering Soft Count.

9. On entry to the Soft Count room, each Team Member must sign with badge number the Soft Count room sign in sheet (pg. 6) and indicate the time of entry. On leaving the Soft Count Room, each Team Member must note the time of exit from the room on the sign in sheet.
10. Once in the Soft Count room, the casino chips shall be opened by the Cage Supervisor or above in full view of the QTGA Compliance Agent or above, a Security Supervisor or above, and an Income Audit Lead or above, unloaded and placed on a Soft Count table and bulk verified.

THE VERIFICATION PROCESS

1. The Cage Supervisor or above shall verify the chips by breaking one barrel down from each rack and slide a chip along side of the rack the barrel came out of in clear view of QTGA, Surveillance, and the verifying Team Members in the room. Once all the chips have been verified, the total shall be recorded on the Chip Accountability Verification Form (pg. 7) and the chips shall be placed into the cart and locked. The verifying Team Members include Income Audit, QTGA, Cage, and Security. The verifying Team Members shall sign, including badge number, the Chip Accountability Verification Form as the verifiers. The Cage Supervisor, Income Audit Lead or above, QTGA Compliance Agent or above, and Security Supervisor shall sign their time out on the Daily Room Access Log (pg. 6) and exit the room. The QTGA Compliance Agent or above and the Security Officer shall escort the Cage Supervisor or above to the Main Bank.
2. During the verification process, the Cage Supervisor or above shall inspect the chips for defects that may include the following reasons:
 - a. Chips are foreign in nature.
 - b. Chips are incorrect color/logo.
 - c. Chips are inconsistent in any way.
3. If the chips contain security features they will be individually verified by the Cage Supervisor or above prior to commissioning.
4. If the chips are found to be defective the following shall occur:
 - a. Upon approval of the Gaming Operations Controller or above, the Cage Supervisor or above, under the observation of Income Audit, Security, QTGA, and Surveillance shall:
 - i. Promptly seal the unverified chips with Tamper Evidence Tape.
 - ii. The Chips will be secured in a locked push cart.
 - iii. Purchasing will be notified to request replacement from the vendor.

- iv. Chips will be held in a locked push cart in the Soft Count Room for return or decommission based on the approval of the QTGA.
5. Following verification, the chips shall be placed in a locked cart for transport to the Chip Bank.
6. The Cage Supervisor or above shall take the locked cart to the Main Bank Cashier, ask the Main Bank Cashier to verify the chips before they are incorporated into inventory. The Main Bank Cashier shall sign off on the Chip Accountability Verification Form (pg. 7) and include badge number to show verification was completed. The Main Bank Cashier or above shall enter the new chips into the ABACUS system, increasing the chip inventory, which ensures that the computer system matches the actual chips on hand. The Main Bank chip inventory will later be sent to Chip Bank to add to the Chip Bank inventory.
7. All original documentation is maintained by the Income Audit department. Copies shall be given to QTGA, Table Games, Cage and Security.

RECONCILIATION

1. At the end of the last gaming day of the month, the Chip Accountability Verification Form and Chip Bank Settlement Sheet (pg. 5) shall be tied by conducting a physical inventory count by Income Audit of chips in the bank.
2. If the amount of chips in the Chip Bank does not reconcile with the closing Chip Bank total, an additional verification shall take place immediately by Income Audit.
3. All logs shall be maintained by Income Audit and made available to QTGA upon request.

CHIP STORAGE

1. All new shipments of casino chips placed in inventory shall be stored in the Chip Bank.

CHIP DESTRUCTION

The destruction of Casino chips shall be done according to DCR's Casino Chip Destruction policy (#6320.75).

CHIP BANK SETTLEMENT SHEET

DATE: 4/1/10

SHIFT: D S G

OUTGOING CASHIER SIG./ID# _____ INCOMING CASHIER SIG./ID# _____

OUTGOING CASHIER SIG./ID# _____ INCOMING CASHIER SIG./ID# _____

ACCOUNTABILITY

1	OPENING BALANCE	6,989,889.00
2	ADD:	
3	TXFRS FROM MAIN BANK	50,391.00
4	DECOM/FOREIGN CHIPS	0.00
5	TABLE CREDITS	0.00
6		
7	TXFRS TO MAIN BANK	3,500.00
8	DONATIONS	0.00
9	TABLE FILLS	43,255.00
10	ANTE TRANSFERS	0.00
11	TOTAL ACCOUNTABILITY	6,993,525.00

INVENTORY

12	PRIMARY CHIP TOTAL	2,664,899.50
13	RESERVE PRIMARY	2,882,500.00
14	SECONDARY CHIP TOTAL	1,375,000.00
15	YR ANNIVERSARY COMM CHIPS	0.00
16	ANTE CHIPS	\$71,075.00
17	CONTAMINATED CHIPS	0.00
18	MUTE CHIPS	\$0.00
19	FOREIGN CHIPS	\$50.50
20	INVENTORY TOTAL	6,993,525.00
21	INVENTORY TOTAL	6,993,525.00
22	LESS ACCOUNTABILITY	6,993,525.00
23	Over/Short	0.00

DAILY ROOM ACCESS LOG

[illegible]

Chip Accountability Verification Form

Control Number _____

Date _____

Time _____

Primary Chip Inventory

Color	Denom	Inventory #	Value \$
Orange	\$1,000		
Purple	\$500		
Black	\$100		
Green	\$25		
Red	\$5		
Blue	\$3		
White	\$1		
Yellow	\$25		
Pink	\$0.50		
Gold	\$0.25		
Total			

Income Audit Name/Lic # _____

Security Name/Lic # _____

TGA Name/Lic # _____

Main Bank Name/Lic # _____

Secondary Chip Inventory

Color	Denom	Inventory #	Value \$
Purple	\$500		
Black	\$100		
Green	\$25		
Red	\$5		
Total			

Cage Supervisor Name/Lic # _____

Internal Audit Name/Lic # _____

Income Audit must attach copies of each packing slip

Quapaw Tribal Gaming Agency



Date Received	7/12/11
Comments	
Reviewed By	MK 7/19/11 JB 7/14/11 Bm 7/13/11
Approved	Tentative
Not Approved	Final

Policy and Procedure Submission

Policy Name and Number: Controlled Access Policy Policy #6320.24.01	Department: Compliance	Submission Date: 7/14/2011
Narrative Description: To establish Team Member, vendor, and visitor access to secured areas of Downstream Casino Resort. This is a revised version based on QTGA comments provided to us on 6/30/2011.		DCR/QTGA Tracking: POLICIES & PROCEDURES DDA APPROVED JUL 27 2011

DCR Compliance Authorization

Signature: _____

Stephan BJA 2551

Date: _____

7/7/11

Department Director Authorization

Signature: _____

M. L. Smith

Date: _____

7/7/11

General Manager Authorization

Signature: _____

James

Date: _____

7/12/11

QTGA Authorization

Signature: _____

Sheld

Date: _____

7/20/11

Controlled Access Policy	Policy No: 6320.24.01	Issue Date: 7/20/2011
PURPOSE: To establish Team Member and vendor access to secured areas.		

DCR Compliance – ITEM Tracking	Date
Issue Date	7/20/2011
Compliance Review	3/17/2010
QTGA Submission	3/23/2010
QTGA Final Approval	3/23/2010
GM Approval	3/21/2010
Compliance Revisions	8/4/2010
QTGA Submission	8/5/2010
QTGA Return	9/1/2010
Compliance Review	9/3/2010
Compliance Review	4/8/2011, 4/14/2011
QTGA Submission	4/25/2011
QTGA Return	5/11/2011
Compliance Review	6/2/2011
QTGA Submission	6/9/2011
QTGA Return	6/30/2011
Compliance Review	6/30/2011
QTGA Submission	7/14/2011
GM Approval	7/12/2011
DDA Final Approval	7/27/2011

POLICY

1. It is the policy of the Downstream Casino Resort (DCR) to restrict access to secure areas. Secured areas include the following:
 - a. Cage
 - b. Poker Cage
 - c. High Limit Cage
 - d. Main Bank
 - e. Man Trap
 - f. Gaming Pits

- g. Count Room
 - h. Soft Count Cart Room
 - i. Card Vault Room/Card Destruct Room
 - j. Server Room
 - k. IDFs
 - l. Surveillance Viewing Room
 - m. Surveillance Monitoring Room
 - n. Back of House
2. DCR has developed an access list (pg. 4), which is attached and titled "Master Access List". The list identifies secured areas of DCR and which group of Team Members, Vendors, and Visitors has access to those secured areas. The list also indicates whether the Team Members, Vendors, or Visitors have instant access or require a Security or department escort to enter the secured area.
 3. Any other Team Member of DCR that needs access to any of the identified secured access areas will need approval via a Secured Access Request/Activity Review Form.
 4. Vendors without individual key licenses will be treated as visitors and will not be allowed to enter the back of the house without an escort by Security or a Team Member from the Department being visited. Security will obtain the Vendor's drivers license in exchange for a visitor's badge. They will not be allowed in any secured area of DCR until they have a valid key license.
 5. Vendors with individual key licenses will be allowed in the back of the house as long as they are escorted by Security or the Department Team Member. Security at Post 3 will obtain the Vendor's drivers license in exchange for a vendor badge. They will be allowed in secured areas of DCR as long as they are escorted by the Department Lead or above or designee.
 6. Emergency personnel may have access to secured areas of DCR under special circumstances, such as a medical emergency.
 7. Any Quapaw Casino Team Member may enter the back of house as long as they are escorted by Security or a Team Member from the Department. A visitor badge is not necessary if they are displaying their Quapaw Casino gaming badge. If they do not have their Quapaw Casino gaming badge, then Security will obtain their driver's license in exchange for a visitor's badge.

They will not be allowed in any secured area of DCR unless there is a Secured Access Request allowing them to enter the secured area.

8. The Quapaw Tribe Business Committee may enter the back of the house without an escort. They will follow the same guidelines as the DDA in secured areas, which is to be escorted by the Department Lead or above or designee in those secured areas.
9. There are secured doors that require a proxy card to access, such as the VIP and Shipping Hall Doors. Management approval is required for Team Members to obtain a badge allowing access to these doors.

PROCEDURE

Master Access List

1. The Master Access List shall be proposed by DCR's Compliance Department and be approved by the General Manager and Chief Financial Officer (CFO) of DCR. Once it is approved by the General Manager and CFO, it shall be submitted to the Quapaw Tribal Gaming Agency (QTGA) for review and approval prior to implementation.
2. Any requested alterations to the Master Access List shall be provided to DCR's Compliance Department. Once the revised Master Access List is approved by the General Manager and CFO, it shall be submitted to QTGA for approval.
3. At a minimum, the Master Access List shall be reviewed and approved by the CFO and General Manager of DCR and submitted as approved to the QTGA at least annually.

Control of Proxy Cards

1. The QTGA will program the Team Member badges which contain proxy cards, according to the Master Access List.

Access

Team Member, Vendor and Visitor access will be controlled in these categories:

1. Unrestricted Access - Team Members granted immediate unescorted access to the area due to daily work being preformed as approved in the Master Access List.
2. Security Escort Access- Team Members or Key Licensed Vendors are escorted by Security and are granted access as approved in the Master Access List.

3. Department Escort Access- Team Members or Key Licensed Vendors are escorted by the Department Lead or above or designee and are granted access as approved in the Master Access List.
4. Secured Access Request/Activity Review Form Required - Team Members who are only granted access as approved by a requesting department, DCR Compliance Department, and QTGA (Compliance Agent, Compliance Supervisor, Compliance Manager, Deputy Director or Executive Director) as noted on a Activity Review /Secured Access Request form (pg. 5). Approval may be written or verbal.

Master Access List

06/30/2011

Area	Cage	Poker Cage	High Limit Cage	Main Bank	Man Trap	Gaming Pits	Count Room (In progress)	Count Room (Not in Progress)	Soft Count Cart Room	Card Vault/Card Destruct Rooms	Server Room	IDF	Surveillance Viewing Room (Must sign log)	Surveillance Monitoring Room (Must sign log)	Back of the House
Team members															
DDA	D	D	D	D	D	D	D	D	D	S	D	D	D	D	✓
General Manager	✓	✓	✓	✓	✓	✓	✓	✓	✓	D	D	D	*	*	✓
Assistant General Manager	✓	✓	✓	✓	✓	✓	✓	✓	✓	D	D	D	*	*	✓
CFO	✓	✓	✓	✓	✓	D	✓	✓	✓	D	D	D	*	*	✓
Gaming Operations Controller	✓	✓	✓	✓	✓	D	✓	✓	✓	D	D	D	*	*	✓
Security Guards and above	✓	✓	✓	✓	✓	✓	✓	✓	✓	D	D	D	*	*	✓
Director of Surveillance	✓	✓	✓	✓	✓	✓	✓	✓	✓	D	D	D	✓	✓	✓
Manager on Duty	X	X	X	X	S	✓	X	D	D	D	X	X	*	*	✓
Main Bank Cashiers or above	✓	✓	✓	✓	✓	X	D	D	S	X	X	X	*	*	✓
Cage Cashiers	✓	✓	✓	D	✓	X	X	X	X	X	X	X	X	X	✓
Count Team Members or above	X	X	X	X	✓	X	✓	✓	✓	X	X	X	*	*	✓
Poker/Table Game Team Members or above	X	X	X	X	X	✓	X	X	X	X	X	X	*	*	✓
IT Team Members	S	S	S	S	S	S	S	S	S	X	✓	✓	*	*	✓
Income Auditors	D	D	D	D	✓	S	X	S	S	S	X	X	X	X	✓
Compliance (DCR)	✓	✓	✓	✓	✓	✓	✓	✓	✓	S	D	D	✓	*	✓
Surveillance Agents and above	X	X	X	X	X	X	X	X	X	X	X	X	✓	✓	✓
Surveillance Tech.	S	S	S	S	✓	S	S	S	S	S	D	D	✓	✓	✓
Risk Manager	S	S	S	S	S	S	X	S	S	S	D	D	*	*	✓
Facilities Team Members with key licenses	S	S	S	S	S	S	X	S	S	S	S	S	*	*	✓
Other DCR Team Members	A	A	A	A	A	A	A	A	A	A	A	A	X	X	✓
Vendors with Valid Individual Key Licenses	D	D	D	D	D	D	D	D	D	S	D	D	*	*	D
QTGA	✓	✓	✓	✓	✓	✓	✓	✓	✓	S	D	D	✓	✓	✓
Visitors	X	X	X	X	X	X	X	X	X	X	X	X	X	X	D
External Auditors	A	A	A	A	A	A	A	A	A	A	A	A	A	A	✓

Access Code Key

✓- Unrestricted Access

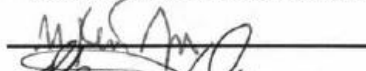
A- Activity Review/Secured Access Form

S- Security Escort

X- Restricted Access

D- Department Escort (Lead or Above or Designee)

* - See approved Surveillance Access in Surveillance Standards Policy

 Chief Financial Officer
 General Manager

Date Received: _____

Reviewed By: _____

Comments: _____

☐ Approved

☐ Not Approved



Quapaw Tribal Gaming Agency

Secured Access Request and Activity Review Form For Downstream Casino

Date: _____

Time: _____

Work to be performed:

Name of individuals involved and badge # if applicable:

<u>Access Area</u>	<u>Yes</u>	<u>No</u>	<u>Access Area</u>	<u>Yes</u>	<u>No</u>
Cage			Poker Cage		
High Limit Cage			Main Bank		
Soft Count Cart Room			Count Room (In progress)		
Count Room (Not in progress)			Surveillance		
Pit Access # _____			Server Room		
IDF# _____					

Casino Compliance Authorization or Designee

Signature: _____

Date: _____

Requesting Department Authorization

Signature: _____

Date: _____

QTGA Authorization

Signature: _____

Date: _____

Quapaw Tribal Gaming Agency



Date Received	6/20/11
Comments	
Reviewed By	ME 6/27/11 BM 6/29/11 BM 7/5/11
Approved	Tentative
Not Approved	Final

Policy and Procedure Submission

Policy Name and Number: Dealer Tokes Policy #1400.43.02	Department: Cage	Submission Date: 6/9/2011
Narrative Description: To establish policy and procedures for processing Dealer Tokes through the Main Bank. This is a revised version based on the QTGA review comments provided to us on 5/11/2011.		DCR/QTGA Tracking: POLICIES & PROCEDURES DDA APPROVED JUL 27 2011

DCR Compliance Authorization

Signature: Stephani Ball 2551

Date: 6/7/11

Department Director Authorization

Signature: [Signature]

Date: 6/9/11

General Manager Authorization

Signature: [Signature]

Date: 6/27/11

QTGA Authorization

Signature: [Signature]

Date: 7/20/11

Dealer Tokes	Policy No: 1400.43.02	Issue Date: 7/20/2011
PURPOSE: To establish policy and procedures for processing Dealer tokens through the Main Bank.		

DCR Compliance – ITEM Tracking	Date
Issue Date for #1400.43.01	8/9/2010
QTGA Submission	7/8/2009
QTGA Return	11/6/2009
Compliance Review	4/29/2010
QTGA Submission	4/29/2010
QTGA Return	7/28/2010
Compliance Review	7/29/2010
QTGA Submission	8/5/2010
GM Approval	8/5/2010
QTGA Final Approval	8/10/2010
DDA Final Approval	8/12/2010
Compliance Revisions to 1400.43.01	4/18/2011
QTGA Submission	4/21/2011
QTGA Return	5/11/2011
Compliance Review	6/7/2011
QTGA Submission	6/9/2011
GM Approval	6/17/2011
QTGA Approval	7/20/2011
DDA Final Approval	7/27/2011

POLICY

Dealer tokens are acceptable, but may not be solicited by the Dealer. The following is the proper procedure for accepting, maintaining, and distributing Dealer tokens.

PROCEDURES

Accepting Tokes

1. When a token is generated, the Dealer will collect and deposit the token in a Table Games Token box.

Maintaining Tokes

1. When the Dealer has completed his/her assigned shift, the Dealer shall take their token boxes to the Main Bank Jackpot Window, to be counted by a Main Bank Cashier, along with a Table Game Dealers Tip Worksheet (Page 5).
2. The Dealer shall write his/her name on the Table Game Dealers Tip Worksheet, a (3) part form, along with their badge number and the date. The Dealer shall also sign their signature and badge number on the Dealer's Signature line contesting that they provided the Main Bank the Token box.

3. The Dealer shall fold the Table Game Dealers Tip Worksheet and place it in the top slot of the Dealer Token box and turn the box into the Main Bank Cashier.
4. The Main Bank Cashier shall call Surveillance before counting the Dealer tokens.
5. The Main Bank Cashier shall unlock the Dealer Token box, empty the contents and briefly display the box to show it is empty to surveillance.
6. The Main Bank Cashier shall timestamp the Table Game Dealers Tip Worksheet.
7. The Main Bank Cashier shall count all the contents of the Dealer Token box by denomination.
8. Once the tokens have been counted the Main Bank Cashier shall fill out the rest of the Table Game Dealers Tip Worksheet. The Worksheet contains the following information:
 - a. Table Games Dealer Name and Badge Number
 - b. Date
 - c. Total Amount of Tokens
 - d. Amount to the Table Games Supervisor's Pool
 - e. Amount to Table Games Dealer
 - f. Amount to Table Games Dealer's Pool
 - g. Total Amount
 - h. Table Games Dealer's Signature and badge number
 - i. Main Bank Cashier's Signature and badge number
9. The Main Bank Cashier shall calculate the Table Games Dealer's tokens as follows:
 - a. Calculate the total tokens received from the Dealer.
 - b. Divide this number by two (1/2 of the Dealer Tokens received is written on the "Amount to Dealer's Pool")
 - c. The other half, the Dealer's half, is minus the Cashier's Token (if any). The balance is written on the "Amount to Dealer".
 - d. Add the "Amount to Dealer's Pool" and the "Amount to Dealer" and this figure goes in two places on the sheet. "Total Amount of Tokens" and "Total Amount". These should agree.

10. If the Table Games Dealer decides to compensate the Cage, the token to the Cage shall be taken from the 50% split that would go to the actual Dealer and the amount would be at the Dealer's discretion.
11. After the Tokens have been calculated and written on the Dealer Token Sheet, the sheet will be placed in the blue box on the left side of the counter to ensure verification in Surveillance.
12. Table Games Dealer tokens are distributed in the following manner:
 - a. 50% of the Tokens to the actual Dealer
 - b. 50% of the Tokens to a Common Dealer pool.
 - c. Any tokens to the Main Bank Cashier shall be taken from the "Amount to the Dealer".
13. The Main Bank Cashier will write the denomination totals on the right of the form and these totals will be entered into the Cage ABACUS system by the following:
 - a. Select "Receive" from location.
 - b. Enter Password.
 - c. Choose "Table Games Tokens".
 - d. Choose the name of the Dealer.
 - e. Enter the total amount paid to the Dealer by denomination.
 - f. Select "Save" and a receipt shall print.
 - g. Sign the receipt with the Cashier's signature and badge number.
 - h. Select "Yes" received a good print out.
14. The white and yellow copy of the Token worksheet shall go to Audit at the end of the Main Bank shift and the pink copy shall be held in the Main Bank until a Table Games Shift Supervisor or above retrieves them to be distributed to the Dealers.
15. All deposits shall be reported by Income Audit to the Payroll Department at the end of each pay cycle.

Distribution Tokes

1. Tokes will be allocated by payroll to the Table Games Dealer listed on the Table Games Dealers Tip Worksheet.
2. The Table Games Shift Manager shall review and approve the Table Games Dealer token pool.
3. All tokens will be disbursed on the Dealer's normal pay check.
4. Tokens may never be accepted as cash by the Table Games Dealers from the Cage. Any failure to comply with this policy will be considered an attempt to circumvent reporting and be subject to the Dealer's discipline up to and including termination.
5. 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 as may be deemed necessary.



TABLE GAME DEALERS TIP WORKSHEET

Name: Jack Jackson ID Number: 1234

Date: 1-1-10 Total Amount of Tokens: 38

Amount to the Supervisors Pool: 0

Amount to Dealer: 18 (cage tip \$2) Red 31

Amount to Dealers Pool: 20 White 7

Total Amount: 38

Dealers Signature: X X ID# 1234

Cashiers Signature: Starvin ID# 153

White - Cage

Yellow - Accounting

Pink - Employee

SP 20064

Quapaw Tribal Gaming Agency



Date Received	7/6/11
Comments	
Reviewed By	MLC 7/12/11 JB 7/11/11 Bm 7/7/11
Approved	Tentative
Not Approved	Final

Policy and Procedure Submission

Policy Name and Number: DCR EGM Software Control Policy #1200.27.01	Department: EGM	Submission Date: 6/16/2011
Narrative Description: To establish policy and procedure for software transfers for Downstream Casino Resort (DCR) for Electronic Gaming Machines (EGM). This is a revised version based on QTGA comments provided to us on 6/3/2011.		DCR/QTGA Tracking: POLICIES & PROCEDURES DDA APPROVED JUL 27 2011

DCR Compliance Authorization

Signature: _____

Stephani Ball 2551

Date: _____

6/9/11

Department Director Authorization

Signature: _____

Bliss M. M... 621

Date: _____

6/14/11

General Manager Authorization

Signature: _____

Heather Brewer

Date: _____

6/30/11

QTGA Authorization

Signature: _____

Shelby

Date: _____

7/15/11

EGM – Software Control	Policy No: 1200.27.01	Issue Date: 7/15/2011
PURPOSE: To establish a policy for software transfers.		

DCR Compliance – ITEM Tracking	Date
Issue Date	7/15/2011
Compliance Review	9/10/2009
QTGA Submission	9/10/2009
QTGA Return	12/21/2009
Compliance Review	2/23/2010
QTGA Submission	2/25/2010
QTGA Return	4/1/2010
Compliance Review	6/21/2010
QTGA Submission	7/1/2010
QTGA Return	8/2/2010
Compliance Review	8/18/2010
QTGA Submission	8/19/2010
QTGA Return	9/16/2010
Compliance Review	9/30/2010
QTGA Submission	10/7/2010
QTGA Return	11/24/2010
Compliance Review	12/31/2010
QTGA Submission	1/4/2011
QTGA Return	1/27/2011
Compliance Review	3/24/2011
QTGA Submission	4/7/2011
QTGA Return	5/6/2011
Compliance Review	5/11/2011
QTGA Submission	5/20/2011
QTGA Return	6/2/2011
Compliance Review	6/9/2011
QTGA Submission	6/16/2011
GM Approval	6/30/2011
QTGA Final Approval	7/15/2011
DDA Final Approval	7/27/2011

DCR Software Transfer Procedures

New Software Transfers

1. Quapaw Tribal Gaming Agency (QTGA) verifies software.
 - a. QTGA notifies Downstream Casino Resort (DCR) Electronic Gaming Machine (EGM) Technical Supervisor or above upon completion of verification.

2. QTGA arranges for software transfer to software storage cabinet, which is only for the casino owned games. Any software that is not casino owned must remain with QTGA.
 - a. QTGA schedules appointment with DCR Lead EGM Technician or above to transfer software.
 - b. DCR Lead EGM Technician prepares DCR EGM Software Transfer Log (pg. 7). The log entry will indicate the following:
 - i. Reason for transfer from QTGA Compliance
 - ii. Origin of software
 - iii. Programs within the software
 - iv. Date of transfer
 - v. Time of transfer
 - vi. Software type
 - vii. Signature and badge number of DCR EGM Technician receiving software
 - viii. Signature and badge number of QTGA Compliance Agent or above transferring software
3. QTGA transfers software to the software storage cabinet.
 - a. DCR Lead EGM Technician and QTGA Compliance Agent or above check out software storage cabinet key from Key Watch cabinet.
 - b. DCR Lead EGM Technician accesses software storage cabinet via cabinet key.
 - c. DCR Lead EGM Technician fills out EGM Storage Log (pg. 8).
 - d. QTGA Compliance Agent or above turns software over to Lead EGM Technician.
 - e. DCR Lead EGM Technician places software in appropriate location within software storage cabinet.
 - f. DCR Lead EGM Technician and QTGA Compliance Agent or above sign EGM Software Transfer Log.
 - g. DCR Lead EGM Technician also signs QTGA EGM Software Transfer Log.
 - h. DCR Lead EGM Technician secures software storage cabinet via cabinet key.
 - i. QTGA receives copy of EGM Software Transfer Log upon request.
4. Documentation

- a. DCR Lead EGM Technician updates Software Inventory sheet (pg. 9).
- b. Software Inventory Sheet on EGM Technician Drive is updated.
- c. New Software Inventory Sheet is e-mailed to QTGA Compliance Manager and Supervisor upon request.
- d. DCR EGM Technical Manager retains EGM Software Transfer Log (pg. 7).

In-House Software Transfers

1. To Machine Transfers

- a. DCR Lead or Assistant Lead EGM Technician and QTGA Compliance Agent or above check out software storage cabinet key from Keywatch cabinet.
- b. DCR Lead or Assistant Lead EGM Technician accesses software storage cabinet via cabinet key.
- c. DCR Lead or Assistant Lead EGM Technician fills out EGM Software Storage Log.
- d. DCR Lead or Assistant Lead EGM Technician removes appropriate software from storage cabinet.
- e. DCR Lead or Assistant Lead EGM Technician and QTGA Compliance Agent or above date and sign, including badge number the EGM Software Transfer Log.
- f. DCR Lead or Assistant Lead EGM Technician secures software storage cabinet via cabinet key.
- g. DCR Lead or Assistant Lead EGM Technician and QTGA Compliance Agent or above return software cabinet key to the Keywatch cabinet.
- h. DCR EGM Technician and QTGA Compliance Agent or above escorts software to appropriate machines.
- i. QTGA Compliance Agent or above releases software to the DCR EGM Technician for activity.
- j. DCR EGM Technician installs software in machine.
- k. QTGA Compliance Agent or above locks and seals logic box that contains software.
- l. DCR EGM Technician signs, including date and badge number on QTGA media tracking form.

2. To Machine Transfer Documentation

- a. DCR Lead or Assistant Lead EGM Technician makes entry in EGM Software Transfer Log (pg. 7).

- b. DCR Lead or Assistant Lead EGM Technician converts EGM Software Transfer Log to a PDF and e-mails it to the DCR EGM Technical Manager.
- c. DCR EGM Technical Manager places PDF version of EGM software transfer log on EGM Technical Manager's drive, in a folder titled "Completed Software Transfers".
- d. DCR Lead EGM Technician revises Software Inventory sheet on EGM drive.
- e. New Software Inventory Sheet is e-mailed to QTGA Compliance Manager and Supervisor upon request.

3. From Machine Transfers

- a. QTGA Compliance Agent above removes software logic box seal in machine.
- b. DCR EGM Technician removes software from machine.
- c. DCR EGM Technician hands software to QTGA Compliance Agent or above.
- d. Revoked Software will remain in QTGA possession.
 - i. EGM Technician signs including date and badge number the QTGA media tracking form.
 - ii. QTGA Compliance Agent or above completes QTGA process to ship software back to manufacturer per manufacturer's request or destroy software.
- e. Defective Software will remain in QTGA possession.
 - i. DCR EGM Technician signs, including date and badge number the QTGA media tracking form.
 - ii. QTGA Compliance Agent or above completes QTGA process to ship software back to manufacturer per manufacturer's request or destroy software.
- f. Obsolete Software will be returned to the EGM software storage cabinet.
 - i. Software will continue to be available for future use until it is no longer compatible or is revoked by the manufacturer. If the software is revoked, the vendor will send a revocation notice. DCR EGM Technician will also check to ensure software has not been revoked prior to reuse.
- g. QTGA Compliance Agent or above and the DCR Lead or Assistant Lead EGM Technician obtains the software cabinet key from the Keywatch cabinet.
- h. DCR EGM Lead or Assistant Lead EGM Technician and QTGA Compliance Agent or above escorts software to software storage cabinet.

- i. DCR Lead or Assistant Lead EGM Technician accesses software storage cabinet via cabinet key.
- j. DCR Lead or Assistant Lead EGM Technician fills out EGM Software Storage Log (pg. 8).
- k. QTGA Compliance Agent or above hands software to DCR Lead or Assistant Lead EGM Technician.
- l. DCR Lead or Assistant Lead EGM Technician places software in appropriate location in software storage cabinet.
- m. DCR Lead or Assistant Lead EGM Technician creates new location if a designated location does not exist using the same format as other locations in storage cabinet.
- n. DCR Lead or Assistant Lead EGM Technician and QTGA Compliance Agent or above sign, including date and badge number the EGM Software Transfer Log (pg. 7).
- o. DCR Lead or Assistant Lead EGM Technician and QTGA Compliance Agent or above return software storage cabinet key to the Keywatch cabinet.

4. From Machine Transfer Documentation

- a. DCR Lead or Assistant Lead EGM Technician makes entry in EGM Software Transfer Log (pg. 7).
- b. DCR Lead EGM Technician revises Software Inventory sheet (pg. 9) on EGM drive.
- c. New Software Inventory sheet is e-mailed to QTGA Gaming Compliance Manager and Supervisor upon request.

5. Revoked Software (In Storage)

- a. DCR EGM Technical Supervisor or above, upon notification of software revocation from manufacturer, notifies QTGA Compliance.
- b. QTGA Compliance Agent or above and the DCR Lead or Assistant Lead EGM Technician retrieve the Software Cabinet key from Keywatch.
- c. DCR Lead or Assistant Lead EGM Technician accesses Software Storage Cabinet via the cabinet key.
- d. DCR Lead or Assistant Lead EGM Technician retrieves revoked software from the Software Storage Cabinet.
- e. DCR Lead or Assistant Lead EGM Technician release possession of revoked software to QTGA Compliance Agent or above.
- f. DCR Lead or Assistant Lead EGM Technician and QTGA Compliance Agent or above signs, including date and badge number the QTGA and EGM software transfer log (pg. 7).

- g. DCR Lead or Assistant Lead EGM Technician and QTGA Compliance Agent or above return Software Cabinet key to Key Watch Cabinet.
- h. QTGA Compliance Agent or above completes QTGA process to ship software back to manufacturer per manufacturer's request or destroy software.

6. Defective Software

- a. Software is considered any firmware media that has been certified by an authorized independent laboratory.
- b. Defective software will be turned over to the QTGA Compliance for processing. Defective software will be considered as a device that has been electrically or physically altered enough to prevent its host from correctly reading the information embedded within it.

7. Software Destruction

- a. Software that is deemed defective by a DCR EGM Technician will be turned over to the QTGA Compliance for processing.
- b. DCR EGM Technician signs including date and badge number the QTGA EGM Software Transfer Log.

EGM SOFTWARE TRANSFER LOG

Date	Time	±	Loc	Vndr	Program #	Description	Media	Qty
Purpose:					Staff Signature & #			
					QTGA Agent Signature & #			
Date	Time	±	Loc	Vndr	Program #	Description	Media	Qty
Purpose:					Staff Signature & #			
					QTGA Agent Signature & #			
Date	Time	±	Loc	Vndr	Program #	Description	Media	Qty
Purpose:					Staff Signature & #			
					QTGA Agent Signature & #			
Date	Time	±	Loc	Vndr	Program #	Description	Media	Qty
Purpose:					Staff Signature & #			
					QTGA Agent Signature & #			
Date	Time	±	Loc	Vndr	Program #	Description	Media	Qty
Purpose:					Staff Signature & #			
					QTGA Agent Signature & #			
Date	Time	±	Loc	Vndr	Program #	Description	Media	Qty
Purpose:					Staff Signature & #			
					QTGA Agent Signature & #			
Date	Time	±	Loc	Vndr	Program #	Description	Media	Qty
Purpose:					Staff Signature & #			
					QTGA Agent Signature & #			
Date	Time	±	Loc	Vndr	Program #	Description	Media	Qty
Purpose:					Staff Signature & #			
					QTGA Agent Signature & #			
Date	Time	±	Loc	Vndr	Program #	Description	Media	Qty
Purpose:					Staff Signature & #			
					QTGA Agent Signature & #			
Date	Time	±	Loc	Vndr	Program #	Description	Media	Qty
Purpose:					Staff Signature & #			
					QTGA Agent Signature & #			
Date	Time	±	Loc	Vndr	Program #	Description	Media	Qty
Purpose:					Staff Signature & #			
					QTGA Agent Signature & #			
Date	Time	±	Loc	Vndr	Program #	Description	Media	Qty
Purpose:					Staff Signature & #			
					QTGA Agent Signature & #			
Date	Time	±	Loc	Vndr	Program #	Description	Media	Qty
Purpose:					Staff Signature & #			
					QTGA Agent Signature & #			

EGM Software Storage Log

[illegible]

Software Inventory Sheet Published 04/07/2010

Manufacturer	Description	Software	Qty	Location	Dongle	Qty2	Dongle Location
ATI	Celtic Warrior	0152096 (U72, U73, U85, U86)	1	DRAWER 3			
ATI	Genie Magic	0152121 (U72, U73, U85, U86)	1	DRAWER 3			
ATI	Rodeo	0152146 (U72, U73, U85, U86)	1	DRAWER 3			
ATI	Road Trip	0152539 (U71, U72, U73, U84, U85, U86)	1	DRAWER 3			
ATI	Good Fortune	0152567 (U73, U86)	1	DRAWER 3			
ATI	Grizzly	0152579 (U71, U72, U73, U84, U85, U86)	1	DRAWER 3			
ATI	Black Mustang	0152584 (U72, U73, U85, U86)	1	DRAWER 3			
ATI	Timber Wolf	0154012 (U72, U73, U85, U86)	1	DRAWER 4			
ATI	Magic Mermaid	0251331 (U72, U73, U85, U86)	1	DRAWER 3			
ATI	Tiki Talk	0252129 (U73, U86)	2	DRAWER 3			
ATI	Buccaneer	0252523 (U73, U86)	1	DRAWER 3			
ATI	Pelican Pete	0252555 (U72, U73, U85, U86)	2	DRAWER 3			
ATI	Inca Chief	0252587 (U72, U73, U85, U86)	1	DRAWER 3			
ATI	Wicked Winnings II	0252591 (U72, U73, U85, U86)	1	DRAWER 3			
ATI	Milkin' It	0254023 (U71, U72, U73, U84, U85, U86)	1	DRAWER 4			
ATI	Gelsha	0351033 (U72, U73, U85, U86)	1	DRAWER 3			
ATI	Tiki Torch	0430034 (U59, U60)	2	DRAWER 3			
ATI	Red Baron	0451335 (U72, U73, U85, U86)	1	DRAWER 3			
ATI	Star Drifter	0451341 (U72, U73, U85, U86)	1	DRAWER 3			
ATI	50 Lions	0551340 (73, U86)	1	DRAWER 3			
ATI	Set chip	06.02.19 (U72, U73)	4	DRAWER 3			
ATI	Set chip	06.02.21 (U72, U73)	2	DRAWER 3			
ATI	Sun & Moon	0630035 (U59, U60)	1	DRAWER 3			
ATI	Gelsha	0730032 (U59, U60)	3	DRAWER 3			
ATI	Eagle Rock	0930023 (U59, U60)	1	DRAWER 3			
ATI	Pompeii	1.00-60020	1	89D1(B2)			
ATI	Tiki Torch	1.00-60028	3	2-B1D2(D1), 1-88D1(F3)			
ATI	50 Lions	1.00-60044	2	81D1(A1)			
ATI	100 Lions	1.00-60056	1	87D2(B2)			
ATI	Tigress	1.00-60086	2	81D2(E1)			
ATI	Spring Festival	1.00-60107	3	88D1(E3)			
ATI	Heart of Vegas	1.00-60109	1	87D2(A2)			
ATI	Let's Go Fish'n	1.00-60120	3	1-B1D2(E1), 2-88D1(D3)			
ATI	Meteor Storm	1.00-60121	3	89D1(E1)			
ATI	Wild Panda	1.00-60183	2	87D2(C2)			
ATI	Gold Maker	1.00-60200	3	89D1(F1)			
ATI	Where's the Gold	1.00-60202	2	88D1(D3)			
ATI	Dinosaur	1.00-60203	3	88D1(F3)			
ATI	Macaw Magic	1.00-60204	1	81D2(B1)			
ATI	Moon Festival	2.02-60011	2	81D2(C1)			
ATI	Core version	3.03A (U57, U58)	9	DRAWER 3			
ATI	Core version	3.108 (U57, U58)	2	DRAWER 3			
ATI	Set chip	7.00.06	2	89D1(A2)			
ATI	Set chip	7.00.14	1	89D1(A2)			
ATI	Birth chip	C310B (U57, U58)	2	DRAWER 3			
ATI	Eagle Rock sound chip	EB5R500 (U3, U4, U5, U6)	2	DRAWER 3			
ATI	Flame of Olympus sound chip	FO0100 (U3, U4, U5, U6)	2	DRAWER 3			
ATI	Inca Sun sound chip	IS100 (U3, U4, U5, U6)	1	DRAWER 3			
ATI	Liberty 7's sound chip	L7100 (U3, U4, U5, U6)	1	DRAWER 3			
ATI	Sun & Moon sound chip	SM700 (U3, U4, U5, U6)	1	DRAWER 3			

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 ☐ Machine # _____ Denomination _____
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
Player's Name: _____	Copy of Payout Ticket attached? ☐ Yes ☐ No
	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	7/12/11
Comments	
Reviewed By	MC 7/14/11 JB 7/14/11 Bm 7/13/11
Approved	Tentative
Not Approved	Final

Policy and Procedure Submission

Policy Name and Number: Team Member Gaming Policy Policy #7000.01.02	Department: Human Resources	Submission Date: 7/14/2011
Narrative Description: To establish policy and procedures relating to Downstream Casino Resort (DCR) Team Members and their immediate family gaming in the DCR or Quapaw Casino. This is a revision to policy #7000.01.01 to include restrictions for DCR Team Members gaming at the Quapaw Casino since points for the Q-Club card are interchangeable at both DCR and Quapaw Casino. This is a revised version based on QTGA comments provided to us on 5/25/2011.		DCR/QTGA Tracking: POLICIES & PROCEDURES DDA APPROVED JUL 27 2011

DCR Compliance Authorization

Signature: Stephani Ball 2551

Date: 7/12/11

Department Director Authorization

Signature: [Signature]

Date: 7-7-11

General Manager Authorization

Signature: [Signature]

Date: 7/10/11

QTGA Authorization

Signature: [Signature]

Date: 7/20/11

Team Member Gaming	Policy No: 7000.01.02	Issue Date: 7/20/2011
PURPOSE: To establish policy relating to Downstream Casino Resort (DCR) Team Members and their immediate families gaming in the DCR or Quapaw Casino.		

DCR Compliance – ITEM Tracking	Date
Issue Date for version 7000.01.01	7/10/2009
QTGA Final Approval	7/10/2009
General Manager Approval	7/10/2009
Compliance Revisions version 7000.01.01	3/12/2010
QTGA Submission	3/12/2010
QTGA Return	4/2/2010
Compliance Review	4/20/2010
QTGA Submission	4/22/2010
QTGA Return	4/29/2010
Compliance Review	6/11/2010
QTGA Submission	6/17/2010
QTGA Return	7/1/2010
Compliance Review	4/22/2011
QTGA Submission	4/29/2011
QTGA Return	5/25/2011
Compliance Review	7/7/2011
QTGA Submission	7/14/2011
QTGA Final Approval	7/20/2011
GM Approval	7/8/2011
DDA Final Approval	7/27/2011

POLICY

1. It is the policy of the Downstream Casino Resort (“DCR”) to permit Team Members of DCR and their immediate family members to participate in Class II and Class III gaming on a limited basis within the Downstream Casino Resort Facility and/or the Quapaw Casino. For the purpose of this policy, “immediate family” means spouses, domestic partners, children, stepchildren, and any relative or other person residing within the Team Member’s household.

TEAM MEMBER GAMBLING

1. No DCR Team Member is permitted to participate in the following games at either DCR or Quapaw Casino:
 - a. Electronic Gaming Machines (EGM) with an incrementing meter that displays a value in excess of \$100,000 or EGMs that have promotional prizes such as an automobile, motorcycle, boat, vacation package, etc; and

- b. Table games
2. DCR Team Members of the following departments are not permitted to play:
- a. Surveillance
 - b. EGMs
 - c. Income Audit
 - d. Compliance
 - e. Gaming-related Department Managers (Cage, Count, EGMs), Directors, CFO, Assistant General Manager or the General Manager. Those DCR Team Members who are prohibited from gambling at DCR will also be prohibited from the same form of gambling at Quapaw Casino. Managers/Shift Managers of non-gaming related Departments at DCR are permitted to play EGM's that are not otherwise prohibited within this policy.
3. DCR Team Members are not permitted to participate in gaming activities thirty (30) minutes immediately before a scheduled shift of work or thirty (30) minutes immediately following a scheduled shift of work.
4. DCR Team Members are not permitted to wear or carry uniforms or badges while off duty and gambling or drinking.
5. DCR Team Members that are off duty cannot be in the back of house at any time.
6. DCR Team Member vehicles must be removed from the Team Member parking lot prior to engaging in gaming or drinking activities.
7. Proper attire according to the DCR Team Member Handbook for visiting the property shall be followed.
8. DCR Team Members are expected to conduct themselves in an appropriate manner while participating in any gaming activity or use of the DCR or Quapaw Casino. Personal conduct that is deemed inappropriate by the General Manager will result in disciplinary action.

TEAM MEMBER PARTICIPATION IN PROMOTIONS/TOURNAMENTS

1. All DCR Team Members are prohibited from participating in promotions/tournaments at DCR and Quapaw Casino. All DCR Team Members are prohibited from having a Q-Club card at either DCR or Quapaw Casino.

2. Spouses of DCR Team Members are permitted to participate in any EGMs offered by DCR or Quapaw Casino but are not allowed to participate in any promotional events, monetary or otherwise. However, spouses of DCR Team Members may enroll in the Q-Club, earning and redeeming points at any outlet. If a spouse of a DCR Team Member wins a hot seat promotion, they would forfeit their winnings since it is a promotional event.
3. Other family members of DCR Team Members are allowed to participate in all EGMs offered by DCR and Quapaw Casino, including enrollment in the Q-Club and participation in promotional events, monetary and otherwise.
4. Immediate family members of the DCR General Manager, DCR Assistant General Manager, or the DCR Chief Financial Officer are not permitted to participate in promotional events, monetary and otherwise.

TEAM MEMBER USE OF DCR/Quapaw Casino Q CLUB CARD BENEFITS

1. A DCR Team Member may not have or use a DCR or Quapaw Casino Q-Club Card.

SERVICE TO FRIENDS AND FAMILY GAMBLING

1. A DCR Team Member may not provide gambling or cashiering services or benefits/privileges to any relative of that Team Member, or to any person sharing the same residence as that Team Member.

VIOLATION TO THE TEAM MEMBER GAMBLING POLICY

1. Violation of the DCR Team Member Gambling Policy will result in discipline. The General Manager will review each violation and administer discipline at his or her discretion. General guidelines are as follows:
 - a. First Offense: Written Warning at a minimum up to and including termination, determined on a case by case basis by the General Manager
 - b. Second Offense: Immediate termination

Quapaw Tribal Gaming Agency



Date Received	6/20/11
Comments	
Reviewed By	AKC 6/23/11 JB 6/29/11 Bm 7/5/11
Approved	Tentative
Not Approved	Final

Policy and Procedure Submission

Policy Name and Number: <i>Take Procedures for Poker Dealers</i> <i>Policy #1400.64.02</i>	Department: Cage	Submission Date: 6/9/2011
Narrative Description: To establish policy and procedures for Main Bank Cashiers to process Poker Dealer takes through the Main Bank. This is a revised version based on QTGA comments provided to us on 5/11/2011.		DCR/QTGA Tracking: POLICIES & PROCEDURES DDA APPROVED JUL 27 2011

DCR Compliance Authorization

Signature: Stephanie B. 2551

Date: 6/7/11

Department Director Authorization

Signature: [Signature]

Date: 6/9/11

General Manager Authorization

Signature: [Signature]

Date: 6/17/11

QTGA Authorization

Signature: [Signature]

Date: 7/20/11

Token Procedures for Poker Dealers	Policy No: 1400.64.02	Issue Date: 7/20/2011
PURPOSE: To establish token procedures for Poker Dealers.		

DCR Compliance – ITEM Tracking	Date
Issue Date for #1400.64.01	5/13/2010
QTGA Submission	6/3/2009
QTGA Return	11/6/2009
Compliance Review	3/15/2010
QTGA Submission	3/25/2010
QTGA Return	4/12/2010
Compliance Review	4/16/2010
QTGA Submission	4/22/2010
QTGA Return	4/29/2010
Compliance Review	4/30/2010
QTGA Submission	5/6/2010
GM Approval	4/30/2010
QTGA Final Approval	5/13/2010
DDA Final Approval	5/14/2010
Compliance Revisions to #1400.64.01	4/19/2011
QTGA Submission	4/21/2011
QTGA Return	5/11/2011
Compliance Review	6/7/2011
QTGA Submission	6/9/2011
GM Approval	6/17/2011
QTGA Final Approval	7/20/2011
DDA Final Approval	7/27/2011

POLICY

To establish token procedures for Poker Dealers. Tokens shall be provided to the Main Bank for accountability purposes and not be given directly to the Poker Dealers at the end of their shift.

TOKE PROCEDURES

1. All tokens received by Poker Dealers will be placed into a locking token box. All token box keys will be controlled by the Main Bank Cashiers.
2. Poker Dealers will proceed to the Main Bank located in the Cage at the end of their shifts.

3. Each Poker Dealer will hand his/her token box over to the Main Bank Cashier to be opened and emptied by the Main Bank Cashier.
4. The Main Bank Cashier shall Contact Surveillance before counting the Poker Dealer tips.
5. All monies will be counted by the Poker Dealer and the Main Bank Cashier and the amount will then be entered on the Poker Dealer Tip Worksheet (pg. 4) by the Main Bank Cashier.
6. After verification of monies, the Poker Dealer and the Main Bank Cashier will both sign and include their badge number on the Poker Dealer Tip Worksheet.
7. The Poker Dealer will retain the pink copy of the Tip Worksheet. The white copy will be forwarded to Income Audit and the yellow copy will be forwarded to Poker via Income Audit so that all Dealers may have their tips credited to their paychecks.
8. After the Tokens have been calculated and written on the Poker Dealer Token Sheet, the sheet will be placed in the blue box on the left side of the counter to ensure verification in Surveillance.
9. The Main Bank Cashier will write the denomination totals on the right of the form and these totals will be entered into the Cage ABACUS system by the following:
 - a. Select ***"Receive"*** from location.
 - b. Enter Password.
 - c. Choose ***"Poker Dealer Tokens"***.
 - d. Choose the name of the Dealer.
 - e. Enter the total amount paid to the Dealer by denomination.
 - f. Select ***"Save"*** and a receipt shall print.
 - g. Sign the receipt with the Main Bank Cashier's signature and badge number.
 - h. Select ***"Yes"*** received a good print out.

10. At no time will any Poker Dealer retain any part of his/her tips as a form of take home pay.

Distribution Tokes

1. Tokes will be allocated by payroll to the Poker Dealers listed on the Poker Dealer Tip Worksheet.
2. All tokes will be disbursed on the Poker Dealer's normal pay check.
3. Tokes may never be accepted as cash by the Poker Dealer from the Cage. Any failure to comply with this policy will be considered an attempt to circumvent reporting and be subject to Team Member discipline up to and including termination.
4. Nothing in this 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 as may be deemed necessary.



POKER DEALERS TIP WORKSHEET

Name: _____ ID Number: _____

Date: _____ Total Amount of Tokens: _____

Amount to the Supervisors Pool: _____

Amount to Dealer: _____

Total Amount: _____

Dealers Signature: _____ ID# _____

Cashiers Signature: _____ ID# _____

White - Cage

Yellow - Accounting

Pink - Employee

SP 20066

Quapaw Tribal Gaming Agency



Date Received	7/7/11
Comments	
Reviewed By	MC 7/9/11 JB 7/18/11 BM 7/11/11
Approved	Tentative
Not Approved	Final

Policy and Procedure Submission

Policy Name and Number: Universal ID Acceptance Policy Policy #6320.15.01	Department: Compliance	Submission Date: 07/07/2011
Narrative Description: To establish policy and procedures for verifying the identity of patrons.		DCR/QTGA Tracking: POLICIES & PROCEDURES DDA APPROVED JUL 27 2011

DCR Compliance Authorization

Signature: Stephanie Bath 2551

Date: 7/5/11

Department Director Authorization

Signature: M. H. Am

Date: 7/4/11

General Manager Authorization

Signature: [Signature]

Date: 7/7/11

QTGA Authorization

Signature: [Signature]

Date: 7/20/11

UNIVERSAL ID ACCEPTANCE POLICY	Policy No: 6320.15.01	Issue Date: 7/20/2011
PURPOSE: To establish policy and procedures for verifying the identity of patrons.		

DCR Compliance – ITEM Tracking	Date
Issue Date	7/20/2011
Compliance Review	6/9/2011
QTGA Submission	7/7/2011
QTGA Final Approval	7/20/2011
GM Approval	7/7/2011
DDA Final Approval	7/27/2011

POLICY

Downstream Casino Resort (DCR) shall develop a universal policy to be used by all Team Members when verifying the identity of patrons.

PROCEDURES

1. DCR Team Members shall accept the following forms of photo identification to verify the identity of a patron:
 - a. Valid State issued driver's license
 - i. Must be current to be valid
 - b. Valid State issued Identification card
 - i. Must be current to be valid
 - c. U.S. Passport
 - d. U.S. territory driver's license
 - e. U.S. Federal Identification card, such as:
 - i. Permanent resident
 - ii. Resident alien
 - iii. Government employee
 - f. U.S. Military Identification card

g. Canadian drivers license as long as there is a photo and expiration date

2. The following symbols shall be used for each type of Identification:

a. M.I.D. – Military Identification card

b. D.L. – Driver’s License

c. S.I.D. – State Identification Card

d. P.P. – Passport

e. F.I.D – Federal Identification Card

3. The state abbreviations listed below shall be used as a reference for Team Members:

ALABAMA	AL	MONTANA	MT	WYOMING	WY
ALASKA	AK	NEBRASKA	NE		
ARIZONA	AZ	NEVADA	NV		
ARKANSAS	AR	NEW HAMPSHIRE	NH		
CALIFORNIA	CA	NEW YORK	NY		
COLORADO	CO	NEW JERSEY	NJ		
CONNECTICUT	CT	NEW MEXICO	NM		
DELAWARE	DE	NORTH CAROLINA	NC		
DISTRICT OF COLUMBIA	DC	NORTH DAKOTA	ND		
FLORIDA	FL	OHIO	OH		
GEORGIA	GA	OKLAHOMA	OK		
GUAM	GU	OREGON	OR		
HAWAII	HI	PALAU	PW		
IDAHO	ID	PENNSYLVANIA	PA		
ILLINOIS	IL	PUERTO RICO	PR		
INDIANA	IN	RHODE ISLAND	RI		
IOWA	IA	SOUTH CAROLINA	SC		
KANSAS	KS	SOUTH DAKOTA	SD		
KENTUCKY	KY	TENNESSEE	TN		
LOUISIANA	LA	TEXAS	TX		
MAINE	ME	UTAH	UT		
MARYLAND	MD	VERMONT	VT		
MASSACHUSETTS	MA	VIRGIN ISLANDS	VI		
MICHIGAN	MI	VIRGINIA	VA		
MINNESOTA	MN	WASHINGTON	WA		
MISSISSIPPI	MS	WEST VIRGINIA	WV		
MISSOURI	MO	WISCONSIN	WI		

4. The name shown on the identification must be the same as the name the patron is using.

Quapaw Tribal Gaming Agency



Date Received	6/20/11
Comments	
Reviewed By	WLC 6/27/11 JS 7/6/30/11 am 7/7/11
Approved	Tentative
Not Approved	Final

Policy and Procedure Submission

Policy Name and Number: <i>Winners Ticket Policy- Cash</i> <i>Policy #6230.05.03</i>	Department: <i>Marketing</i>	Submission Date: 6/9/2011
Narrative Description: To establish policy and procedures for Winners Tickets. This is a revision to reflect QTGA review comments provided to us on 5/25/2011.		DCR/QTGA Tracking: POLICIES & PROCEDURES DDA APPROVED JUL 27 2011

DCR Compliance Authorization

Signature: Stephan B. H. 2551

Date: 6/17/11

Department Director Authorization

Signature: 17/a

Date: ~

General Manager Authorization

Signature: [Signature]

Date: 6/12/11

QTGA Authorization

Signature: [Signature]

Date: 7/15/11

WINNERS TICKET POLICY - CASH	Policy No: 6230.05.03	Issue Date: 7/15/2011
PURPOSE: To establish policy and procedures for Winners Tickets.		

DCR Compliance – ITEM Tracking	Date
Issue Date for #6230.05.01	12/2/2010
Compliance Review	5/20/2010
QTGA Submission	5/25/2010
QTGA Return	6/3/2010
Compliance Review	6/28/2010
QTGA Submission	7/1/2010
QTGA Return	7/28/2010
Compliance Review	8/2/2010
QTGA Submission	8/5/2010
QTGA Return	9/2/2010
Compliance Review	11/3/2010
QTGA Submission	11/8/2010
QTGA Return	11/19/2010
Compliance Review	11/22/2010
QTGA Submission	11/24/2010
GM Approval	11/24/2010
QTGA Final Approval	12/2/2010
DDA Final Approval	12/6/2010
Revisions to #6230.05.01	12/15/2010
QTGA Submission	12/16/2010
QTGA Return	12/29/2010
Compliance Review	12/30/2010
QTGA Submission	1/4/2011
GM Approval	12/30/2010
QTGA Final Approval for #6230.05.02	1/7/2011
DDA Final Approval	2/10/2011
Compliance Revisions to #6230.05.02	4/21/2011
QTGA Submission	4/29/2011
QTGA Return	5/25/2011
Compliance Review	6/7/2011
QTGA Submission	6/9/2011
GM Approval	6/17/2011
QTGA Approval	7/15/2011
DDA Final Approval	7/27/2011

POLICY

Cash Winners Vouchers (pg. 8) are used to record prize winnings resulting from a promotional event. The promotional event submission (Policy #6230.04.01, Promotions Submission Procedures) shall outline the event and type of payout. Listed below is the process that shall be followed if the payout is paid in cash.

PROCEDURES

Marketing:

1. Form Control:

- a. The Cash Winners Voucher forms will be maintained in Audit. The Marketing/Promotions Supervisor shall request the Cash Winners Voucher form (pg. 8) from Audit when they are needed for a promotion.
- b. There are three (3) copies of the Cash Winners Voucher and they are as follows:
 - i. White – Cage
 - ii. Yellow – Patron
 - iii. Pink – Marketing

2. Prize Control:

- a. Marketing shall conduct the promotional event in accordance with the rules and procedures submitted and approved by the Quapaw Tribal Gaming Agency (QTGA). See Promotions Submission Policy and Procedure #6230.04.01 for details on the QTGA approval process.

3. On the day of the event, the Marketing/Promotions Representative shall have the patron fill out the Cash Winners voucher (pg. 8) with the following information:

- a. Date
- b. Time
- c. Winner Name
- d. Q-Club Card Number
- e. Card Status (Gold, Silver, Bronze)

- f. Valid ID Number (See Universal ID Policy #6320.15.01 for details on acceptable ID's)
 - g. Address (No P. O. Boxes)
 - h. City
 - i. State and Zip Code
 - j. Promotion Name
 - k. Amount Won with value
 - l. Winner Signature and Date
4. Once the patron completes the Cash Winners Voucher, the Marketing/Promotions Representative shall ensure completeness and then sign the form with signature and badge number.
 5. The Marketing Representative shall verify that a valid copy of the patron's ID is in the Patron Management System.
 6. The Marketing Representative shall verify that the patron has a W-9 on file by looking in the common file called W-9.
 7. If the patron has a W-9 on file, the marketing representative will write "W-9 on file" on the top right hand corner of the Cash Winners Voucher.
 8. If the patron does not have a W-9 on file, the Marketing Representative shall attach a copy of the patron's W-9 (pg. 9-12) to the White/Cage copy and provide this with the yellow copy to the Patron.
 9. The patron shall be instructed to take both copies and proceed to the Cage for payment.
 10. The pink copy shall be maintained by the Marketing/Promotions Department and available for review upon request.
 11. For any prize over \$1,000.00, the Marketing Representative shall call the Cage Cashier's desk and notify the Cage Supervisor or above on duty that the prize winner is in route.
 12. For any prize over \$5,000, the Marketing Representative shall escort the patron to the Cage Cashier's desk and notify the Cage Supervisor on duty of the prize payout and provide the Cage the white copy of the Cash Winner Voucher.

- a. If winner voucher information is correct, the Cage Supervisor must call Surveillance to verify payout exceeding \$5,000.

Cage:

1. The Cage Cashier or above shall review the Cash Winners Voucher form to assure the following items are complete:
 - b. Date
 - c. Time
 - d. Winner's Name
 - e. Q-Club Card Number
 - f. Q-Club Card Status
 - g. Valid ID Number (See Universal ID Policy #6320.15.01 for details on acceptable ID's)
 - h. Address (No P. O. Boxes)
 - i. City
 - j. State
 - k. Zip Code
 - l. Promotion Name
 - m. Amount Won (alpha and numeric)
 - n. Winner Signature and Date
 - o. Marketing Representative Signature and Badge Number
 - p. Cage Cashier Signature and Badge Number
2. If the Cash Winner Voucher does not have "W-9 on file" in the top right hand corner, the Cage Cashier or above shall review the attached W-9 for completeness.
3. 30% taxes shall be withheld on all foreign patrons

4. If a patron refuses to supply their social security number, the prize winnings will be placed in Safekeeping until the patron can provide their social security number. (See “No ID Jackpots Processed in the Cage” policy #1400.71.01 for additional safekeeping information.)
5. The yellow copy of the Cash Winners Voucher shall be given to the patron.
6. The white copy of the Cash Winners Voucher shall be dropped in the daily paperwork, to be included as part of the daily reconciliation at the end of the shift in the Main Bank.

Income Audit- Cage:

1. The white copy of the Cash Winner Voucher shall remain with the Cage and forwarded to Income Audit at the end of the shift.
2. If any of the above information is missing or incorrect, Income Audit shall issue an exception to the Marketing/Promotions department.

Cash Winner Voucher Reconciliation:

1. Each Cash Winners Voucher shall be:
 - a. Accounted for
 - b. Verified for correct information
 - c. Filed in the Finance Department with the daily Main Bank income audit paperwork.
2. The Income Auditor completing the Marketing Audit shall review and tic mark line by line, the white originals of the Cash Winners Voucher looking for incorrect information and exception either by the Marketing/Promotions Department or the Cage.
3. Also make sure the patron’s name is the same one on the Cash Winners Voucher.
4. Put the white copies in numerical order and enter into the promotions tracking worksheet.
5. Attach copies of the report to the Cash Winners Voucher.
6. On the white copy enter the following information:
 - a. Date of payout voucher
 - b. Date of promotion
 - c. Amount (alpha and numeric)

Promotions-Winners List

1. A Winners List shall be maintained for tax purposes. Any patron who receives \$600 or more in cash shall receive a 1099 at the end of the year.
2. In order to reconcile a list of each Cash Winners Voucher with a Miscellaneous Form, a list shall be maintained for each patron.
3. Also, any non-cash prize such as automobiles, a Super Bowl trip, or tickets to sports events winners shall be added to the winners list.
4. All Foreign persons shall have 30% taxes withheld at the time of the payout. If a Foreign person receives \$600 or more in cash or value of prizes, a 1042-S shall be submitted to the Department of the Treasury, Internal Revenue Service.
5. From the white copy of the Cash Winners Voucher, the following information is entered:
 - a. Payout date
 - b. Event date
 - c. Ticket Number (Cash Winners Voucher)
 - d. Event Name
 - e. Patron's First Name
 - f. Patron's Last Name
 - g. Patron's Q-Club Number
 - h. Social Security Number
 - i. Birth date
 - j. Street (No P. O. boxes)
 - k. City/Town/Providence
 - l. State
 - m. Zip Code
 - n. Total Prize Amount

- o. Taxes withheld
- p. Valid ID number (See Universal ID Policy #6320.15.01 for details on acceptable ID's)

Reconciling the Event

1. Income Audit shall do the following when reconciling the event:
 - a. Compare the Winner list from promotions to the Winner Reconciliation.
 - b. From the Winner Reconciliation, ensure that all copies of the Cash Winner Vouchers pertaining to the event are provided.
 - c. Sign and include badge number and date.
2. File in monthly Income Audit box.

Attach Form W-9 Here



Downstream Casino Resort

Cash Winners Voucher

Date: _____ Time: _____

Winner's Name: _____

Q-Club Card #: _____ Q-Club Card Status: _____

ID #: _____

Address: _____

City: _____ State: _____ Zip Code: _____

Promotion Name _____

Amount Won (Alpha and Numeric): _____

Please Note: Identify yourself as the winner. Proper identification and Q-Club Card are required. Prize is non-transferable, non-refundable and non-negotiable. Winner has 60 days from the date on this form to claim prize. Winner must be 18 year of age or older. The Downstream Development Authority, dba Downstream Casino Resort reserves all the rights regarding interpretation of rules and eligibility. All decisions are final. If you have any question or concerns, please direct them to the Marketing Department at Downstream Casino Resort 918.919.6290.

Winner(s) are responsible for all applicable taxes. Winner(s) will receive a W2-G and/or a 1099 tax form, when applicable provided by Downstream Development Authority, dba Downstream Casino Resort, both as governmental enterprises of the Quapaw Tribe of Oklahoma (O-Ga-Pah). Cumulative winnings over \$600 will be reported to the IRS as required by Federal Regulations.

Acceptance of prize constitutes winner(s) permission for Downstream Development Authority, dba Downstream Casino Resort to use his/her likeness or name for publicity or promotional uses without compensation. If you have questions about this promotional prize please contact Casino Promotions at 918.919.6290.

Any situation not covered by the Official Rules will be resolved by the Downstream Development Authority, dba Downstream Casino Resort in a manner deemed by the Downstream Development Authority, dba Downstream Casino Resort to be fairest to all concerned. Downstream Development Authority, dba Downstream Casino Resort reserves the right to void any entry, and/or change, cancel or modify any promotion at any time without notice. Upon any dispute resulting from game play, patrons may file Prize Claim with the Quapaw Tribal Gaming Agency following the process outlined in brochures available at the Downstream Casino Resort Cashiers Desk.

Signature of Winner: _____ Date: _____

Marketing Signature: _____ Badge #: _____

Cashier Signature: _____ Badge #: _____

White – Cage (Cash)

Yellow - Patron

Pink – Marketing

**Request for Taxpayer
Identification Number and Certification**

Give form to the
requester. Do not
send to the IRS.

Print or type
See Specific Instructions on page 2.

Name (as shown on your income tax return)

Business name, if different from above

Check appropriate box: ☐ Individual/Sole proprietor ☐ Corporation ☐ Partnership
☐ Limited liability company. Enter the tax classification (D=disregarded entity, C=corporation, P=partnership) ▶
☐ Other (see instructions) ▶

☐ Exempt
payee

Address (number, street, and apt. or suite no.)

Requester's name and address (optional)

City, state, and ZIP code

List account number(s) here (optional)

Part I Taxpayer Identification Number (TIN)

Enter your TIN in the appropriate box. The TIN provided must match the name given on Line 1 to avoid backup withholding. For individuals, this is your social security number (SSN). However, for a resident alien, sole proprietor, or disregarded entity, see the Part I instructions on page 3. For other entities, it is your employer identification number (EIN). If you do not have a number, see *How to get a TIN* on page 3.

Social security number

or

Employer identification number

Note. If the account is in more than one name, see the chart on page 4 for guidelines on whose number to enter.

Part II Certification

Under penalties of perjury, I certify that:

1. The number shown on this form is my correct taxpayer identification number (or I am waiting for a number to be issued to me), and
2. I am not subject to backup withholding because: (a) I am exempt from backup withholding, or (b) I have not been notified by the Internal Revenue Service (IRS) that I am subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the IRS has notified me that I am no longer subject to backup withholding, and
3. I am a U.S. citizen or other U.S. person (defined below).

Certification instructions. You must cross out item 2 above if you have been notified by the IRS that you are currently subject to backup withholding because you have failed to report all interest and dividends on your tax return. For real estate transactions, item 2 does not apply. For mortgage interest paid, acquisition or abandonment of secured property, cancellation of debt, contributions to an individual retirement arrangement (IRA), and generally, payments other than interest and dividends, you are not required to sign the Certification, but you must provide your correct TIN. See the instructions on page 4.

**Sign
Here**

Signature of
U.S. person ▶

Date ▶

General Instructions

Section references are to the Internal Revenue Code unless otherwise noted.

Purpose of Form

A person who is required to file an information return with the IRS must obtain your correct taxpayer identification number (TIN) to report, for example, income paid to you, real estate transactions, mortgage interest you paid, acquisition or abandonment of secured property, cancellation of debt, or contributions you made to an IRA.

Use Form W-9 only if you are a U.S. person (including a resident alien), to provide your correct TIN to the person requesting it (the requester) and, when applicable, to:

1. Certify that the TIN you are giving is correct (or you are waiting for a number to be issued),
2. Certify that you are not subject to backup withholding, or
3. Claim exemption from backup withholding if you are a U.S. exempt payee. If applicable, you are also certifying that as a U.S. person, your allocable share of any partnership income from a U.S. trade or business is not subject to the withholding tax on foreign partners' share of effectively connected income.

Note. If a requester gives you a form other than Form W-9 to request your TIN, you must use the requester's form if it is substantially similar to this Form W-9.

Definition of a U.S. person. For federal tax purposes, you are considered a U.S. person if you are:

- An individual who is a U.S. citizen or U.S. resident alien,
- A partnership, corporation, company, or association created or organized in the United States or under the laws of the United States,
- An estate (other than a foreign estate), or
- A domestic trust (as defined in Regulations section 301.7701-7).

Special rules for partnerships. Partnerships that conduct a trade or business in the United States are generally required to pay a withholding tax on any foreign partners' share of income from such business. Further, in certain cases where a Form W-9 has not been received, a partnership is required to presume that a partner is a foreign person, and pay the withholding tax. Therefore, if you are a U.S. person that is a partner in a partnership conducting a trade or business in the United States, provide Form W-9 to the partnership to establish your U.S. status and avoid withholding on your share of partnership income.

The person who gives Form W-9 to the partnership for purposes of establishing its U.S. status and avoiding withholding on its allocable share of net income from the partnership conducting a trade or business in the United States is in the following cases:

- The U.S. owner of a disregarded entity and not the entity.

- The U.S. grantor or other owner of a grantor trust and not the trust, and
- The U.S. trust (other than a grantor trust) and not the beneficiaries of the trust.

Foreign person. If you are a foreign person, do not use Form W-9. Instead, use the appropriate Form W-8 (see Publication 515, Withholding of Tax on Nonresident Aliens and Foreign Entities).

Nonresident alien who becomes a resident alien. Generally, only a nonresident alien individual may use the terms of a tax treaty to reduce or eliminate U.S. tax on certain types of income. However, most tax treaties contain a provision known as a "saving clause." Exceptions specified in the saving clause may permit an exemption from tax to continue for certain types of income even after the payee has otherwise become a U.S. resident alien for tax purposes.

If you are a U.S. resident alien who is relying on an exception contained in the saving clause of a tax treaty to claim an exemption from U.S. tax on certain types of income, you must attach a statement to Form W-9 that specifies the following five items:

1. The treaty country. Generally, this must be the same treaty under which you claimed exemption from tax as a nonresident alien.
2. The treaty article addressing the income.
3. The article number (or location) in the tax treaty that contains the saving clause and its exceptions.
4. The type and amount of income that qualifies for the exemption from tax.
5. Sufficient facts to justify the exemption from tax under the terms of the treaty article.

Example. Article 20 of the U.S.-China income tax treaty allows an exemption from tax for scholarship income received by a Chinese student temporarily present in the United States. Under U.S. law, this student will become a resident alien for tax purposes if his or her stay in the United States exceeds 5 calendar years. However, paragraph 2 of the first Protocol to the U.S.-China treaty (dated April 30, 1984) allows the provisions of Article 20 to continue to apply even after the Chinese student becomes a resident alien of the United States. A Chinese student who qualifies for this exception (under paragraph 2 of the first protocol) and is relying on this exception to claim an exemption from tax on his or her scholarship or fellowship income would attach to Form W-9 a statement that includes the information described above to support that exemption.

If you are a nonresident alien or a foreign entity not subject to backup withholding, give the requester the appropriate completed Form W-8.

What is backup withholding? Persons making certain payments to you must under certain conditions withhold and pay to the IRS 28% of such payments. This is called "backup withholding." Payments that may be subject to backup withholding include interest, tax-exempt interest, dividends, broker and barter exchange transactions, rents, royalties, nonemployee pay, and certain payments from fishing boat operators. Real estate transactions are not subject to backup withholding.

You will not be subject to backup withholding on payments you receive if you give the requester your correct TIN, make the proper certifications, and report all your taxable interest and dividends on your tax return.

Payments you receive will be subject to backup withholding if:

1. You do not furnish your TIN to the requester,
2. You do not certify your TIN when required (see the Part II instructions on page 3 for details),
3. The IRS tells the requester that you furnished an incorrect TIN,

4. The IRS tells you that you are subject to backup withholding because you did not report all your interest and dividends on your tax return (for reportable interest and dividends only), or

5. You do not certify to the requester that you are not subject to backup withholding under 4 above (for reportable interest and dividend accounts opened after 1983 only).

Certain payees and payments are exempt from backup withholding. See the instructions below and the separate Instructions for the Requester of Form W-9.

Also see *Special rules for partnerships* on page 1.

Penalties

Failure to furnish TIN. If you fail to furnish your correct TIN to a requester, you are subject to a penalty of \$50 for each such failure unless your failure is due to reasonable cause and not to willful neglect.

Civil penalty for false information with respect to withholding. If you make a false statement with no reasonable basis that results in no backup withholding, you are subject to a \$500 penalty.

Criminal penalty for falsifying information. Willfully falsifying certifications or affirmations may subject you to criminal penalties including fines and/or imprisonment.

Misuse of TINs. If the requester discloses or uses TINs in violation of federal law, the requester may be subject to civil and criminal penalties.

Specific Instructions

Name

If you are an individual, you must generally enter the name shown on your income tax return. However, if you have changed your last name, for instance, due to marriage without informing the Social Security Administration of the name change, enter your first name, the last name shown on your social security card, and your new last name.

If the account is in joint names, list first, and then circle, the name of the person or entity whose number you entered in Part I of the form.

Sole proprietor. Enter your individual name as shown on your income tax return on the "Name" line. You may enter your business, trade, or "doing business as (DBA)" name on the "Business name" line.

Limited liability company (LLC). Check the "Limited liability company" box only and enter the appropriate code for the tax classification ("D" for disregarded entity, "C" for corporation, "P" for partnership) in the space provided.

For a single-member LLC (including a foreign LLC with a domestic owner) that is disregarded as an entity separate from its owner under Regulations section 301.7701-3, enter the owner's name on the "Name" line. Enter the LLC's name on the "Business name" line.

For an LLC classified as a partnership or a corporation, enter the LLC's name on the "Name" line and any business, trade, or DBA name on the "Business name" line.

Other entities. Enter your business name as shown on required federal tax documents on the "Name" line. This name should match the name shown on the charter or other legal document creating the entity. You may enter any business, trade, or DBA name on the "Business name" line.

Note. You are requested to check the appropriate box for your status (individual/sole proprietor, corporation, etc.).

Exempt Payee

If you are exempt from backup withholding, enter your name as described above and check the appropriate box for your status, then check the "Exempt payee" box in the line following the business name, sign and date the form.

Generally, individuals (including sole proprietors) are not exempt from backup withholding. Corporations are exempt from backup withholding for certain payments, such as interest and dividends.

Note. If you are exempt from backup withholding, you should still complete this form to avoid possible erroneous backup withholding.

The following payees are exempt from backup withholding:

1. An organization exempt from tax under section 501(a), any IRA, or a custodial account under section 403(b)(7) if the account satisfies the requirements of section 401(f)(2),
2. The United States or any of its agencies or instrumentalities,
3. A state, the District of Columbia, a possession of the United States, or any of their political subdivisions or instrumentalities,
4. A foreign government or any of its political subdivisions, agencies, or instrumentalities, or
5. An international organization or any of its agencies or instrumentalities.

Other payees that may be exempt from backup withholding include:

6. A corporation,
7. A foreign central bank of issue,
8. A dealer in securities or commodities required to register in the United States, the District of Columbia, or a possession of the United States,
9. A futures commission merchant registered with the Commodity Futures Trading Commission,
10. A real estate investment trust,
11. An entity registered at all times during the tax year under the Investment Company Act of 1940,
12. A common trust fund operated by a bank under section 584(a),
13. A financial institution,
14. A middleman known in the investment community as a nominee or custodian, or
15. A trust exempt from tax under section 664 or described in section 4947.

The chart below shows types of payments that may be exempt from backup withholding. The chart applies to the exempt payees listed above, 1 through 15.

IF the payment is for . . .	THEN the payment is exempt for . . .
Interest and dividend payments	All exempt payees except for 9
Broker transactions	Exempt payees 1 through 13. Also, a person registered under the Investment Advisers Act of 1940 who regularly acts as a broker
Barter exchange transactions and patronage dividends	Exempt payees 1 through 5
Payments over \$600 required to be reported and direct sales over \$5,000 ¹	Generally, exempt payees 1 through 7

¹See Form 1099-MISC, Miscellaneous Income, and its instructions.

²However, the following payments made to a corporation (including gross proceeds paid to an attorney under section 6045(f), even if the attorney is a corporation) and reportable on Form 1099-MISC are not exempt from backup withholding: medical and health care payments, attorneys' fees, and payments for services paid by a federal executive agency.

Part I. Taxpayer Identification Number (TIN)

Enter your TIN in the appropriate box. If you are a resident alien and you do not have and are not eligible to get an SSN, your TIN is your IRS individual taxpayer identification number (ITIN). Enter it in the social security number box. If you do not have an ITIN, see *How to get a TIN* below.

If you are a sole proprietor and you have an EIN, you may enter either your SSN or EIN. However, the IRS prefers that you use your SSN.

If you are a single-member LLC that is disregarded as an entity separate from its owner (see *Limited liability company (LLC)* on page 2), enter the owner's SSN (or EIN, if the owner has one). Do not enter the disregarded entity's EIN. If the LLC is classified as a corporation or partnership, enter the entity's EIN.

Note. See the chart on page 4 for further clarification of name and TIN combinations.

How to get a TIN. If you do not have a TIN, apply for one immediately. To apply for an SSN, get Form SS-5, Application for a Social Security Card, from your local Social Security Administration office or get this form online at www.ssa.gov. You may also get this form by calling 1-800-772-1213. Use Form W-7, Application for IRS Individual Taxpayer Identification Number, to apply for an ITIN, or Form SS-4, Application for Employer Identification Number, to apply for an EIN. You can apply for an EIN online by accessing the IRS website at www.irs.gov/businesses and clicking on Employer Identification Number (EIN) under Starting a Business. You can get Forms W-7 and SS-4 from the IRS by visiting www.irs.gov or by calling 1-800-TAX-FORM (1-800-829-3676).

If you are asked to complete Form W-9 but do not have a TIN, write "Applied For" in the space for the TIN, sign and date the form, and give it to the requester. For interest and dividend payments, and certain payments made with respect to readily tradable instruments, generally you will have 60 days to get a TIN and give it to the requester before you are subject to backup withholding on payments. The 60-day rule does not apply to other types of payments. You will be subject to backup withholding on all such payments until you provide your TIN to the requester.

Note. Entering "Applied For" means that you have already applied for a TIN or that you intend to apply for one soon.

Caution: A disregarded domestic entity that has a foreign owner must use the appropriate Form W-8.

Part II. Certification

To establish to the withholding agent that you are a U.S. person, or resident alien, sign Form W-9. You may be requested to sign by the withholding agent even if items 1, 4, and 5 below indicate otherwise.

For a joint account, only the person whose TIN is shown in Part I should sign (when required). Exempt payees, see *Exempt Payee* on page 2.

Signature requirements. Complete the certification as indicated in 1 through 5 below.

1. Interest, dividend, and barter exchange accounts opened before 1984 and broker accounts considered active during 1983. You must give your correct TIN, but you do not have to sign the certification.

2. Interest, dividend, broker, and barter exchange accounts opened after 1983 and broker accounts considered inactive during 1983. You must sign the certification or backup withholding will apply. If you are subject to backup withholding and you are merely providing your correct TIN to the requester, you must cross out item 2 in the certification before signing the form.

3. Real estate transactions. You must sign the certification. You may cross out item 2 of the certification.

4. Other payments. You must give your correct TIN, but you do not have to sign the certification unless you have been notified that you have previously given an incorrect TIN. "Other payments" include payments made in the course of the requester's trade or business for rents, royalties, goods (other than bills for merchandise), medical and health care services (including payments to corporations), payments to a nonemployee for services, payments to certain fishing boat crew members and fishermen, and gross proceeds paid to attorneys (including payments to corporations).

5. Mortgage interest paid by you, acquisition or abandonment of secured property, cancellation of debt, qualified tuition program payments (under section 529), IRA, Coverdell ESA, Archer MSA or HSA contributions or distributions, and pension distributions. You must give your correct TIN, but you do not have to sign the certification.

What Name and Number To Give the Requester

For this type of account:	Give name and SSN of:
1. Individual	The individual
2. Two or more individuals (joint account)	The actual owner of the account or, if combined funds, the first individual on the account ¹
3. Custodian account of a minor (Uniform Gift to Minors Act)	The minor ²
4. a. The usual revocable savings trust (grantor is also trustee)	The grantor-trustee ³
b. So-called trust account that is not a legal or valid trust under state law	The actual owner ¹
5. Sole proprietorship or disregarded entity owned by an individual	The owner ³
For this type of account:	Give name and EIN of:
6. Disregarded entity not owned by an individual	The owner
7. A valid trust, estate, or pension trust	Legal entity ⁴
8. Corporate or LLC electing corporate status on Form 8832	The corporation
9. Association, club, religious, charitable, educational, or other tax-exempt organization	The organization
10. Partnership or multi-member LLC	The partnership
11. A broker or registered nominee	The broker or nominee
12. Account with the Department of Agriculture in the name of a public entity (such as a state or local government, school district, or prison) that receives agricultural program payments	The public entity

¹ List first and circle the name of the person whose number you furnish. If only one person on a joint account has an SSN, that person's number must be furnished.

² Circle the minor's name and furnish the minor's SSN.

³ You must show your individual name and you may also enter your business or "DBA" name on the second name line. You may use either your SSN or EIN (if you have one), but the IRS encourages you to use your SSN.

⁴ List first and circle the name of the trust, estate, or pension trust. (Do not furnish the TIN of the personal representative or trustee unless the legal entity itself is not designated in the account title.) Also see *Special rules for partnerships* on page 1.

Note. If no name is circled when more than one name is listed, the number will be considered to be that of the first name listed.

Privacy Act Notice

Section 6109 of the Internal Revenue Code requires you to provide your correct TIN to persons who must file information returns with the IRS to report interest, dividends, and certain other income paid to you, mortgage interest you paid, the acquisition or abandonment of secured property, cancellation of debt, or contributions you made to an IRA, or Archer MSA or HSA. The IRS uses the numbers for identification purposes and to help verify the accuracy of your tax return. The IRS may also provide this information to the Department of Justice for civil and criminal litigation, and to cities, states, the District of Columbia, and U.S. possessions to carry out their tax laws. We may also disclose this information to other countries under a tax treaty, to federal and state agencies to enforce federal nontax criminal laws, or to federal law enforcement and intelligence agencies to combat terrorism.

You must provide your TIN whether or not you are required to file a tax return. Payers must generally withhold 28% of taxable interest, dividend, and certain other payments to a payee who does not give a TIN to a payer. Certain penalties may also apply.

Secure Your Tax Records from Identity Theft

Identity theft occurs when someone uses your personal information such as your name, social security number (SSN), or other identifying information, without your permission, to commit fraud or other crimes. An identity thief may use your SSN to get a job or may file a tax return using your SSN to receive a refund.

To reduce your risk:

- Protect your SSN,
- Ensure your employer is protecting your SSN, and
- Be careful when choosing a tax preparer.

Call the IRS at 1-800-829-1040 if you think your identity has been used inappropriately for tax purposes.

Victims of identity theft who are experiencing economic harm or a system problem, or are seeking help in resolving tax problems that have not been resolved through normal channels, may be eligible for Taxpayer Advocate Service (TAS) assistance. You can reach TAS by calling the TAS toll-free case intake line at 1-877-777-4778 or TTY/TDD 1-800-829-4059.

Protect yourself from suspicious emails or phishing schemes.

Phishing is the creation and use of email and websites designed to mimic legitimate business emails and websites. The most common act is sending an email to a user falsely claiming to be an established legitimate enterprise in an attempt to scam the user into surrendering private information that will be used for identity theft.

The IRS does not initiate contacts with taxpayers via emails. Also, the IRS does not request personal detailed information through email or ask taxpayers for the PIN numbers, passwords, or similar secret access information for their credit card, bank, or other financial accounts.

If you receive an unsolicited email claiming to be from the IRS, forward this message to phishing@irs.gov. You may also report misuse of the IRS name, logo, or other IRS personal property to the Treasury Inspector General for Tax Administration at 1-800-366-4484. You can forward suspicious emails to the Federal Trade Commission at: spam@uce.gov or contact them at www.consumer.gov/idtheft or 1-877-IDTHEFT(438-4338).

Visit the IRS website at www.irs.gov to learn more about identity theft and how to reduce your risk.



Printed on recycled paper

GPO U.S. GOVERNMENT PRINTING OFFICE: 2007-339-891/60063