

Tribal Minimum Internal Control Standards

REG-WOS 2011-005 121416-017

Gaming Regulatory Commission approved variance

In accordance with LTBB Minimum Internal Control Standards, Section II., General Operations, paragraph W. Variance Requests, the Gaming Regulatory Commission has approved the following variance request based on the joint submission of the request from Odawa Casino Resort Management and Regulatory Departments.

Section XIII, Drop and Count, M., Collecting currency cassettes and financial instrument storage components from kiosks.

Current

Controls must be established and procedures implemented to ensure that currency cassettes and financial instrument storage components are securely removed from kiosks. Such controls must include the following:

1. Surveillance must be notified prior to the financial instrument storage components or currency cassettes being accessed in a kiosk.
2. Every Drop period, tickets redeemed at the kiosk shall be removed by two employees: at least one employee must be independent of the kiosk accountability.
 - a. Drop each currency acceptor canister from each kiosk at least daily.

Gaming Regulatory Commission approved Variance

Controls must be established and procedures implemented to ensure that currency cassettes and financial instrument storage components are securely removed from kiosks. Such controls must include the following:

1. Surveillance must be notified prior to the financial instrument storage components or currency cassettes being accessed in a kiosk.

2. Every Drop period, tickets redeemed at the kiosk shall be removed by two employees: at least one employee must be independent of the kiosk accountability.
 - a. Drop each currency acceptor canister from each kiosk at least **weekly**.

This variance is approved for testing purposes to determine if a proposed change to the LTBB Tribal Minimum Internal Controls is warranted and maintains the required level of internal controls to protect Tribal assets.

The testing period is 30 days. Testing is scheduled to begin Tuesday, April 4th, 2017 and be completed by May 3rd, 2017.

Requestors

Eric Mc Lester 0563

OCR General Manager

3-20-17

Date

J. V. Cook

Regulatory Director

3-20-17

Date

GRC Approval

Dan Danni

GRC Chairman

3-22-17

Date