



Roseau River Anishinabe First Nation Government
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November 22, 2023

To whom it may concern,

We at Roseau River Anishinabe First Nation have our own "Gaming Law" it was ratified on September 5th, 1991, by the following families:

1. Dianne Alexander
2. Henry Antoine
3. Peter Atkinson
4. Richard Hayden
5. Robert James
6. Mitch Larocque
7. Ronald Littlejohn
8. Gloria Nelson
9. Gary Roberts
10. Eddie Smith Sr.
11. Norma Tait
12. Randy Thomas

I have attached the following documents for which fall under "the Act Respecting Gaming of the Roseau River Anishinabe First Nation" (RRAFNF):

The following ratified documents are as below for your information:

- The Act Respecting Gaming of the Roseau River Anishinabe First Nation
- Gaming Control Policy
- Bingo Policy
- Blackjack Policy

We do not need to ratify, nor do we need a vote, the "Gaming Law" has been ratified already. We can proceed with our casino, without Manitoba Lotteries or Government permission. Meaning we can go out and purchase our own machines.

If you have any questions, contact (204)427-2312.

Rachel Ferreira,
Councillor

AN ACT RESPECTING

GAMING OF THE

ROSEAU RIVER ANISHINABE FIRST NATION

AUGUST 1991

DECLARATION OF THE ROSEAU RIVER ANISHINABE FIRST NATION

Our history and foundation of Anishinabe Nationhood is rooted in the faith and knowledge of who we are and why. It is therefore essential to declare;

1. The Creator put us here as Anishinabe, the First People.
2. The Creator gave us laws that govern all our relationships to live in harmony with nature and mankind.
3. The laws of the Creator defined our rights and responsibilities.
4. The Creator gave us spiritual beliefs, and a place on earth which provided us with all our needs.
5. We have maintained our Freedom, our Language, our Customs, our Traditions, since Creation.
6. We continue to exercise our rights and fulfill the responsibilities given us by the Creator from the land upon which we were placed.
7. The Creator has given us the right to govern ourselves and the right to self-determination.
8. The rights and responsibilities given to us by the creator cannot be altered or taken away by any other Nation.

The Roseau River Anishinabe First Nation understands the above Declaration and shall diligently practice and exercise the principles and rights inherent in our history. The Roseau River Anishinabe First Nation are heirs and successors of our Past, Rights, Beliefs, Treaties, and Governing Structures. They are also the keepers of our Culture, Language, Customs, Obligations, and Trust, and as such, are accountable to the total membership. The Roseau River Anishinabe First Nation shall protect our Treaties, Lands, and the People. Accordingly, the ideologies, principles and qualifications of the Roseau River Anishinabe First Nation shall have demonstrated characteristics which reflect Trust, Fairness, Confidence, and Competence.

THE ROSEAU RIVER ANISHINABE FIRST NATION GAMING ACT

ENACTED: _____

The elected Chief and Council of the Roseau River Anishinabe First Nation hereby enacts the following legislation as proposed and ratified by the Roseau River Anishinabe First Nation Custom Council.

1. DEFINITIONS:

In this Act;

- a) "Chief and Council" shall mean those political representatives elected under the Roseau River Anishinabe First Nation Election Act.
- b) "Custom Council" shall mean those Tribal members appointed by the family units of the Roseau River Anishinabe First Nation meeting in assembly.
- c) "Gaming Commission" shall mean those Tribal members appointed by Custom Council to oversee the Administration of this Act.
- d) "Gaming" shall mean a lottery, bingo, raffle, card, Nevada {pull tab}, slot {VLT} game, or any other games of chance.
- e) "Licensee" shall mean a First Nation Tribal member who, as principal agent or sub-agent, is engaged, employed or appointed by the Gaming Commission to promote a gaming conducted and managed pursuant to a license issued by Gaming Commission.
 - * *All traditional games of amusement and chance, i.e. Moccasin Game, shall be exempt from this legislation.*
- f) "License" shall mean a Contract or Agreement to conduct gaming as set out by the Gaming Commission.

2. POWERS OF THE GAMING COMMISSION

The Gaming Commission may conduct and manage gaming for the Roseau River Anishinabe First Nation;

- a) within the traditional territory of the Roseau River Anishinabe First Nation,
- b) within any other jurisdiction, in conjunction with and in accordance with any agreement entered into with the gaming authorities of that jurisdiction.
- c) upon approval of the Custom Council may for the Roseau River First Anishinabe First Nation, enter into an agreement for that purpose.

3. LEVEL OF AUTHORITY:

The level of authority of Gaming Commission;

- a) The Gaming Commission shall oversee and license all gaming;
 - i) within the territory of the Roseau River Anishinabe First Nation.
 - ii) within the territory claimed by the Roseau River Anishinabe First Nation.
- b) The Gaming Commission shall develop gaming policies, rules and regulations which are to be ratified by the Custom Council.
- c) The Gaming Commission shall obtain approval from Custom Council on its' Annual Budget and Operational Plan.
- d) The Gaming Commission shall provide such reports as required from time to time by Custom Council and Chief and Council.

4. PROCEEDS OF ROSEAU RIVER ANISHINABE FIRST NATION GAMING

- a) The Gaming Commission shall submit to the Custom Council an annual budget, identifying the costs of administering Roseau River Anishinabe First Nation Gaming Act.
- b) Further the net proceeds realized from the conduct and management of gaming activities after deducting costs thereof, the Gaming Commission, shall;
 - i) Deposit of Revenue; the Gaming Commission shall deposit all proceeds to a specific Gaming Commission Bank Account on a daily basis.
 - ii) shall administer on behalf of the Custom Council grants or donations to organizations, societies, associations, groups, or individuals, of the Roseau River Anishinabe First Nation, in accordance with the guidelines, approvals and budgets established by the Custom Council.
 - iii) transfer all surpluses to the Band Custom Council Account, to be used as deemed necessary by Custom Council.

5. SECURITY:

To ensure the integrity of the Gaming Commission activities, security shall be provided to safeguard;

- a) Revenues and Staff
- b) Assets
- c) Clientele
- d) Product

through the employment of qualified professional security personnel and security mechanisms as deemed necessary.

6. **REGULATIONS:**

For the purpose of carrying out the provisions of this Act, the Gaming Commission according to their intent, may make regulations ancillary thereto and not inconsistent therewith; and every regulation made pursuant to, and in accordance with the authority granted by, this section has the force of law; and, without restricting the generality of the foregoing, Gaming Commission may make regulations,

- a) respecting the locations and premises in which the gaming referred to, may be conducted and managed;
- b) respecting the licensing of locations and premises in which the gaming activity referred to, may be conducted and managed.
- c) prescribing the form of any gaming to be conducted and managed,
- d) prescribing the amount and value of each prize to be awarded in the gaming activity,
- e) prescribing the money or other valuable consideration to be paid to secure a chance to win a prize in the gaming activity,
- f) prescribing the manner in which gaming tickets, if any, for participation in the gaming are to be sold to the public,
- g) restricting the amount of money to be realized from the gaming activity.

7. **GAMING LICENSES:**

Where pursuant to the provisions of this Act the Custom Council specifies or designates the Gaming Commission as the authority for the issuance of licenses for the conduct and management of gaming, the Gaming Commission may, in accordance with those provisions;

- a) issue any of the licenses,

- b) prescribe the terms and conditions to be contained in a license so issued, relating to the conduct and management of the gaming for which the license is issued,
- c) revoke that license for non-compliance to the Terms and Conditions of that license.

8. **GAMING COMMISSION MAY OPERATE LICENSED GAMING WHERE:**

- a) a term or condition contained in a license for the conduct and management of gaming issued under this Act, or
- b) the licensee so requests, as the case may be, the Gaming Commission may, for and on behalf of the licensee, operate or manage the gaming to which the license relates, and may enter into an agreement with the licensee for that purpose.

9. **AUDIT OF LICENSEE RECORDS:**

The Gaming Commission may direct an audit to be made, by an auditor appointed by the Custom Council, of the books, records and accounts of any licensee in respect of a gaming activity conducted and managed pursuant to a license issued under this Act.

10. **ACCESS TO LICENSEE RECORDS:**

Where the Gaming Commission directs an audit to be made of the books, records and accounts of a licensee, the licensee shall allow the auditor, free access to the books, records and accounts at all reasonable times for the purpose of this audit.

11. **BREACH OF TERMS AND CONDITIONS OF LICENSE:**

Any licensee who violates or fails to comply with any term or condition of a license for a gaming activity issued by the Gaming Commission is guilty of an offence and liable, to a Fine not exceeding \$1,000.00, and further shall not be issued a gaming license for a period of up to 5 years.

12. MEMBERSHIP OF THE GAMING COMMISSION:

- a) The Gaming Commission Board shall consist of six (6) Tribal members as appointed by the Custom Council.
- b) The affairs of the Gaming Commission shall be administered by the board. In addition, Chief or Council member with the Portfolio of Gaming will act as an ex-officio member.

13. POWERS OF THE GAMING COMMISSION:

For the purpose of administering the affairs of the Gaming Commission, the Board shall;

- a) exercise the powers of the Gaming Commission,
- b) make rules of procedure for the conduct of the affairs of the Gaming Commission,
- c) make rules concerning the date, time, place, and manner of calling, holding, and conducting meetings.
- d) operate on the basis of consensus, but with a minimum of four (4) Board members present at meetings of the Gaming Commission held for the purposes of this Act.

14. TERM OF OFFICE:

- a) Each Board member of the Gaming Commission shall hold office for a term of two (2) years.
- b) The Custom Council shall retain the right to rescind the appointment of Commission members for non-performance of duties

15. CHAIR-PERSON AND VICE-CHAIR-PERSON:

Custom Council shall designate one of the members of the board as Chair-person and one as Vice-Chair-person, and the Vice-Chair-person shall have the powers and duties of the Chair-person in the event of the absence or incapacity of the Chair-person.

16. **REMUNERATION:**

- a) The Gaming Commission may pay to the members of the Board such remuneration for their services as the Custom Council may approve and such reasonable out-of-pocket expenses as they may incur in the performance of their duties as members of the Board.
- b) The Gaming Commission shall remunerate all unemployed members of the Board for meetings related to the administration of this Act.
- c) The Commission shall remunerate all elders and unemployed Custom Council representatives called together for consultation, reports, etc., related to the administration of this Act.

17. **STATEMENT OF COMMISSION ACCOUNTS:**

A statement showing, for each fiscal year of the Roseau River Anishinabe First Nation, all monies transferred and held in trust in the Band Custom Council Account, all monies expended therefrom shall be published in the Audited statement of the Gaming Commission for that fiscal year.

18. **ANNUAL REPORTS:**

The Gaming Commission shall provide an annual report to the Custom Council, and shall consist of;

- a) the gaming activities conducted and managed,
 - b) the licenses issued by the Gaming Commission and the gaming activities conducted and managed pursuant thereto,
 - c) the gaming activities operated or managed by the Gaming Commission for and on behalf of licensees,
 - d) the general administration of this Act
- for the preceding fiscal year.

19. **FORM AND CONTENT OF REPORTS:**

Every annual report submitted shall contain an audited statement of the affairs of the Gaming Commission for the preceding fiscal year and shall be in such form and contain such information as the Custom Council may require.

20. **ADDITIONAL REPORTS:**

The Gaming Commission shall keep and maintain or cause to be kept any such records and accounts of its finances as the Auditor may require.

21. **INSPECTION OF RECORDS:**

The books, records, and accounts of the Gaming Commission shall at all reasonable times be open for inspection by the Auditor or by some person acting under his/her authority.

22. **AUDIT:**

The accounts of the Gaming Commission shall, at least once in each fiscal year, be audited and reported on by an auditor, and the cost thereof shall be paid by the Gaming Commission.

23. **SPECIAL AUDITS:**

In addition to the audits required, the Custom Council may at any time order an audit of or investigation into the accounts or affairs of the Gaming Commission and, where the Chair-person of the Custom Council orders such an audit or investigation, he/she shall designate the person, who may be the Auditor, to make the audit investigation.

24. **EMPLOYMENT OF STAFF:**

The Gaming Commission may employ such staff as it deems necessary to carry out its operations within the confines of the approved budget.

25. COSTS OF ADMINISTRATION:

The costs of administering this Act, including operational/maintenance costs and expenses of conducting and managing the gaming, shall be paid out of the proceeds of its operations under this Act.

26. LOANS:

- a) The Gaming Commission may with the approval of the Custom Council apply for loans in order to carry out the business of the Gaming Commission.

27. ENFORCEMENT AND RESCINDMENT:

- a) The Roseau River Anishinabe First Nation Gaming Act shall govern the conduct and management of gaming within the territory of the Roseau River Anishinabe First Nation. All other lotteries, gaming rules, and regulations previously enacted are hereby rescinded effective three (3) months after the coming into force of this Act.

28. AMENDMENTS:

Any amendments to this Act may be made from time to time by a meeting called specifically for that purpose by the Custom Council.

Effective this date, the tribal membership of the ROSEAU RIVER ANISHINABE FIRST NATION as represented by the family unit representatives of the CUSTOM COUNCIL, hereby ratify the Roseau River Anishinabe First Nation Gaming Act and Regulations.

Dated this 5th day of SEPTEMBER, 1991

Diana Alexander
ALEXANDER REPRESENTATIVE

Peter Atkinson
ATKINSON REPRESENTATIVE

Henry Antoine (Attobesta)
ANTOINE REPRESENTATIVE

Richard Hayden
HAYDEN REPRESENTATIVE

JOHNSON REPRESENTATIVE

Robert James
JAMES REPRESENTATIVE

M. Laroque
LAROQUE REPRESENTATIVE

Paul Littlejohn
LITTLEJOHN REPRESENTATIVE

MARTIN/FRENCH REPRESENTATIVE

Gloria Nelson
NELSON REPRESENTATIVE

PATRICK REPRESENTATIVE

PIERRE REPRESENTATIVE

Robert
ROBERTS REPRESENTATIVE

SENNIE REPRESENTATIVE

SEENIE REPRESENTATIVE

Eddie Smith
SMITH REPRESENTATIVE

Norma Tait
TAIT REPRESENTATIVE

Rory Thomas
THOMAS REPRESENTATIVE

ROSEAU RIVER ANISHINABE FIRST NATION

GAMING CONTROL POLICY

Gaming Control Policy

I. Definitions:

As used in this Gaming Control Policy, the following terms shall have the meaning assigned to them in this Section.

- a. "Roseau River Anishinabe First Nation" shall mean the Roseau River Anishinabe First Nation.
- b. "Gaming Commission" shall mean the body, duly appointed in accordance with the provisions of the Roseau River Anishinabe First Nation Gaming Act, 1991.
- c. "Gaming Activity" shall mean any activity operated, in part or in whole, for the conduct of Bingo, the sale of pull tabs, and the conduct of other games of chance.
- d. "Bingo, Pull tabs, Video Games of Chance, Blackjack, and other games" shall have the meaning given to them in the sections of this Policy governing the conduct of such games.
- e. "Management officials" shall mean any persons who have a direct financial interest in, or management responsibility for, a Gaming Activity, and in the case of corporation shall include those individuals who serve on the board of directors of such corporation and each of its stockholders who hold {directly or indirectly} 10 percent or more of its issued and outstanding stock.
- f. "Key Employees" shall mean persons who serve as the General Manager of a Gaming Activity, person who has {along or with others} the authority to sign cheques or create or discharge financial obligations for Gaming Activity, people have or are in charge of or work within the money room of a Gaming Activity, and person whose responsibilities include the operation or management of Video Games of Chance.
- g. "Roseau River Anishinabe First Nation Gaming Act of 1991" shall mean the Gaming Act adopted on September 5, 1991.
- h. "Gaming Test Laboratory" shall mean, a laboratory agreed to and designated in writing by the Gaming Commission and the Chief and Council as competent and qualified to conduct scientific tests and evaluations of Video Games of Chance and related equipment. A laboratory operated by or under contract with the states of Minnesota, or Nevada, or New Jersey, or South Dakota constitutes a designated Gaming test laboratory.

II. Licensing and Regulation of Gaming Activity;

The following licensing and regulatory provisions shall apply to all Gaming activities on the Roseau River Anishinabe First Nation:

a. Necessity

No Gaming Activity shall be permitted to operate on the Roseau River Anishinabe First Nation unless --

- i) the Gaming Activity has in effect a current license issued by the Gaming Commission; and
- ii) all Management officials and Key employees of the Gaming Activity have current licenses to perform their functions, issued by the Gaming Commission.

b. Procedure for Issuance

For Gaming activities, the licensing procedure of the Gaming Commission shall be as follows;

i) Gaming Activities

The Gaming Commission may grant licenses for a Gaming Activity, if the following requirements are met by each such Gaming Activity.

1. Each place, facility, or location on which Gaming is to be conducted must be the subject of a separate license.
2. The Gaming Commission created by mandate of Custom Council, must have the sole proprietary interest and responsibility for the conduct of the Gaming Activity, provided, that management functions for any Gaming Activity may be contracted by the Gaming Commission to another person or entity, if such contract is approved by appropriate Roseau River Anishinabe First Nation authorities.
3. Each license issued by the Gaming Commission must ensure that adequate accounting procedures will be maintained, and verifiable financial reports will be prepared for the Gaming Commission, in the licensed Gaming Activity.
4. Each license shall require that the Gaming Commission shall be entitled to access to the daily operations of the Gaming, and shall have the right to verify the daily gross revenues and income made from such activity.

5. Each license, shall be conditioned upon the licensee's compliance with the restrictions and requirements of this Policy.

ii) Management officials and Key employees - Applications.

Persons who wish to become Management officials or Key employees of a Gaming Activity shall apply for licenses from the Gaming Commission, on a form approved by the Gaming Commission. Applications shall be signed under oath, and shall contain the applicant's name and address; a description of any previous experience of the applicant in Gaming with First Nations and with the Gaming industry generally; the name and address of any licensing or regulatory agency that the applicant has, or has had, a contract relating to Gaming; a description of any criminal conviction, an any indictment or information of which the applicant has been the subject, except minor traffic offenses; and in the case of Management officials, a complete financial statement. In addition, applicants shall respond to such written or oral questions as the Gaming Commission may propound, and shall provide such additional information as the Gaming Commission may deem pertinent to their license application.

iii) Management officials and Key employees -- background checks.

Upon receipt of an application, the Gaming Commission shall perform a background check of the applicant. The Gaming Commission may also furnish the application to such other law enforcement entities, and private security firms, for additional background checks, as the Gaming Commission deems appropriate.

iv) Management officials and Key employees -- license issuance.

No license shall be issued by the Gaming Commission for a Management official or Key employee until the results of background checks described in this Policy have been provided to the Gaming Commission. Nor shall such license be issued by the Gaming Commission until and unless the Gaming Commission has affirmatively determined that the applicant's prior activities, criminal records, if any, and reputation, habits and associations do not pose a threat to the public interest or to the effective regulation of Gaming, or create or enhance the danger of unsuitable, unfair, or illegal practices and methods and activities in the conduct of Gaming, and unless the

applicant qualifies for employment under the provisions of this Policy.

v. Temporary License

Notwithstanding any other provision of this Policy, a person who has pending before the Gaming Commission an application to become a Management official or Key employee may be employed by a Gaming Activity on a temporary basis, and receive a temporary license under this section, pending the results of the background checks contemplated by this Policy, provided that such person must be subject to immediate discharge if the results of such background checks reveal that such person does not meet the employment qualification of this Policy, or of the Roseau River Anishinabe First Nation Gaming Act of 1991.

vi. Notices

The Gaming Commission shall promptly notice the applicant and appropriate authorities of the results of all background checks, and the issuance of all licenses, under the provisions of these regulations.

III. Rules and Restriction of Gaming Activities

Each licensee operating a Gaming Activity under a license issued pursuant to these regulations must at all times observe the following rules and restrictions on Gaming activities:

a. No Credit extended

All Gaming shall be conducted on a cash basis. Except as herein provided, no person shall be extended credit for Gaming by any Gaming Activity. This restriction shall not apply to credits won by players who activate play on Video Games of Chance after inserting coins or currency into the game, and shall not restrict the right of a Gaming Activity to offer cheque cashing or to install or accept bank cards or credit card transactions in the same manner as would be normally permitted at any retail business within the Roseau River Anishinabe First Nation.

b. Minimum age for Players

No person below the age of ___ years on the date of the Gaming shall be permitted to participate in the Gaming in any Gaming Activity. If any person below the age of ___ years plays and otherwise qualifies to win any prize, the prize shall not be paid, and the estimated amount wagered during the course of the game shall be returned to the player.

c. Procedural Manuals

Each Gaming Activity shall publish and maintain a manual governing personnel policies and procedures, including standards of conduct and job descriptions for each employee, and describing the procedures that the activity will follow, and the rights available, to each employee subject to the manual.

ROSEAU RIVER ANISHINABE FIRST NATION

Policy and Procedures

Bingo Policy

POLICY AND PROCEDURES

BINGO POLICY

I. Rules And Restrictions Governing Bingo games

The conduct of Bingo games must take place within the following rules and restrictions:

a. Bingo Equipment to be used

The conduct of Bingo must employ a machine or other device from which Bingo balls, or appropriate substitute equipment, are withdrawn, ensuring that such drawing is on a random basis. The balls or appropriate substitute drawing must be available for inspection by the players before a Bingo session begins to determine that all are present and in operating condition. Each numbered ball or marker must be essentially equal as to size, weight, shape and balance and as to all other characteristics that may control their selection and all must be free from any defects and be present in the receptacle before each Gaming is begun. Each Bingo card must have printed on its face both its individual card or sheet number and the series number assigned by the manufacturer to that set of Bingo cards.

b. Conduct of Games

Bingo games shall be conducted in the following manner:

- i) each Gaming Activity conducting Bingo games shall post a notice or notices on its premises which are plainly visible to the public, and which shall contain the rules governing the conduct of Bingo.
- ii) all sales of Bingo cards must take place upon the site immediately preceding or during the session for which the Bingo cards are being sold.
- iii) no Bingo card shall be reserved for use by players, except Braille cards or other cards for use by legally blind or disabled players.
- iv) the particular arrangement of numbers required to be covered in order to win each game must be clearly described and announced to the players immediately before.
- v) Immediately following the drawing of each ball in a Bingo game, the caller shall display the letter and number on the ball to the

players; and the corresponding letter or number on the Gaming activities flash board must be lit for players viewing.

- vi) a winner shall be determined when a specified pattern of called numbers appear on a card; and every winning card shall be verified by an employee of the Gaming Activity.
- vii) upon a Bingo player declaring a winning Bingo, the next ball or object randomly selected must be removed and must be the next ball or object to be called in the event the declared winning Bingo is not valid.
- viii) no person shall engage in any act, practice, or course of operation that would affect the integrity or adversely affect the outcome of any Bingo game.
- ix) no person who works at a Gaming Activity during a Bingo session shall be permitted to play in a Bingo session.
- x) no person who works at a Gaming Activity may have direct contact with a member of his or her immediate family, including the employees spouse, child, parent, brother, or sister, on any matter involving the play of Bingo, during a Bingo session.

c. Bingo Records.

For each Bingo session, the following records must be kept.

- i) the number of players in attendance.
- ii) the total amount wagered.
- iii) the total prizes, cash and non-cash, awarded.
- iv) a copy of the schedule of games and their prizes.
- v) the number and prize of cards sold, by type.

d. Checkers required.

One or more checkers must be engaged for each Bingo session. The checker or checkers must record on a form prescribed by the Gaming Commission the number of cards played in each game, the registration or card number of each winning card, and the prizes awarded to the recorded cards. Each checker must certify that the figures are correct to the best of the checker's knowledge.

e. Gross receipts compared and discrepancies reported.

The gross receipts of each Bingo occasion must be compared to the checkers' records by an employee of the Gaming Activity who did not sell cards for the session. The comparison must be on a form prescribed by the Gaming Commission. If a discrepancy of more than \$20. is found between the gross receipts as reported by the checkers and the gross receipts determined by totaling the cash receipts, a copy of the comparison must be provided to the Gaming Commission within five days of the Bingo session.

ROSEAU RIVER ANISHINABE FIRST NATION

Policy and Procedures

Blackjack Policy

POLICY & PROCEDURES

BLACKJACK POLICY

I. Rules and Restrictions Governing "Blackjack" games.

The conduct of games of "Blackjack" must take place in accordance with the following rules and restrictions:

a. Object of game.

Blackjack shall be a table game played by a maximum of seven players, with one deal per table. The object of the game shall be for a player to obtain a higher total point count than the dealer, but not to exceed twenty one points, and subject to the provisions of this Policy, the rules of play shall be those generally applicable to the game known as "Blackjack" or "Twenty one", as that game is played in Canada and the United States of America.

b. Cards and Values.

The game shall be played with decks of Blackjack cards, which shall have the characteristics specified in Section 5.e.3 of this Gaming Control Policy. For purposes of Blackjack, the Blackjack cards shall have the following values;

- 1) aces shall count either one point or eleven points, at the option of the player.
- ii) numbered Blackjack cards shall count the same number of points as the number on the card {for example, a "9" card shall count as 9, and a "10 card shall count as 10.
- iii) Blackjack cards bearing a King, Queen, or Jack shall count as 10.

In the initial deal, when a player or the dealer is dealt an ace and any of the ten count Blackjack cards, that combination shall constitute a natural Blackjack, which may be identified by the player or dealer as "Blackjack".

c. Wagers.

In the play of Blackjack, the following forms of wagers may be made by a player;

- 1) ORIGINAL WAGER

An original wager shall be made by placing a chip or chips representing an amount from two dollars to ten dollars, as designated by a sign plainly posted at each table, inside the betting space provided on the playing surface of the Blackjack playing table, before the first card is dealt in the game. Once the first card is dealt in the game, no Original Wager may be altered by any player.

ii) SPLIT WAGER

If a player receives, in the initial deal of cards, either a pair or any two ten count cards, the player may split the cards, provided that no player may play more than four hands in one betting space. For each hand thus created, the player may wager an amount equal to the Original Wager.

iii) DOUBLE DOWN WAGER

After receiving two cards, or two cards for each hand in a split hand, a player may make a Double Down Wager by wagering an additional amount equal to the Original Wager; and a player playing split hands may make a Double Down Wager by wagering an amount equal to the Original Wager for one or more such hands, provided that no player may place a Double Down Wager on split Aces.

iv) INSURANCE WAGER

If the first card received by the Dealer is an Ace, a player may make an insurance wager in an amount equal to one half of the amount of the Original wager.

v) TIP BET WAGER

A Tip bet wager, if made, shall be made before the first card is dealt, and may be in any amount up to one half of the original wager. It may not be increased or change during play, and cannot be the subject of the Double Down Wager or an Insurance Wager. If, following a Tip bet Wager, a player splits hands, the Tip Bet Wager shall be assigned to the player's right hand set of cards {the first cards to be played}. All Tip Bet Wagers shall have a pay off of one dollar for each dollar wagered, whether or not the player receives a natural Blackjack. When a Tip Bet Wager is made, if a player's hand wins the Tip Bet Wager shall be returned to the player and the amount won from the Enterprise becomes the property of the Dealer; if the Dealer's hand wins the Tip Bet Wager becomes the property of the Enterprise; if the Players player's hand ties the Dealer's

hand, the player may either take back the Tip Bet Wager or leave it on the playing surface for the next round of play.

vi) **DISPOSITION OF A TIP BET WAGERS RECEIVED**

All tip bets won by a Dealer shall be deposited in the locking Tip Box in the Dealer's pit area, shall be pooled with all other tips earned by Dealers, and shall be divided weekly between Dealers and Pit Bosses on a formula to be agreed upon by them, subject to the requirements of Roseau River Anishinabe First Nation regulations.

d. **Staffing:**

At any Gaming Activity conducting Blackjack games, the following staffing requirements shall apply:

i) **NECESSARY STAFF ON DUTY:**

At all times during the conduct of Blackjack games at a Gaming Activity, the following staff must be on duty;

- a. at least one cashier;
- b. at lease one pit boss for each pit area open, and not less than one pit boss for each four open tables;
- c. one dealer per open table.

ii) **TRAINING OF DEALERS:**

All dealers in Blackjack games must have completed at least thirty hours of training within the Gaming Activity.

iii) **TRAINING OF PIT BOSSES:**

All pit bosses must have completed at least six weeks of employment as a dealer, and at least thirty hours of pit boss training within the Gaming Activity.

e. **Equipment**

The following requirements shall apply to all equipment used in the play of Blackjack:

1) **BLACKJACK PLAYING TABLE -- PHYSICAL CHARACTERISTICS**

Each playing table for the play of Blackjack shall have the following characteristics;

1. The playing table shall have either five or seven separate distinct betting spaces.
2. The playing surface of the playing table shall prominently display the following complete statements: "Blackjack pays 3 to 2" and "Caller must stand on 17 and must draw to 16".
3. Drop boxes, meeting the requirements of Section 5.e.2. of this Gaming Control Policy shall be securely locked to each playing table.
4. The playing surface shall include special betting places used of the placement of Tip Bet Wagers.
5. Unless only one playing table is used at a Gaming Activity, a playing table number must be either permanently imprinted, or adhesively backed and impressed thereon, or attached to the top of each playing table.
6. Each playing table or pit area shall be equipped with a removable transparent lockable Tip Box.
7. A card or plaque located on the top of each playing table must indicate the minimum and maximum wagers permitted under the provisions of this Gaming Control Policy.

ii) **DROP BOXES -- PHYSICAL CHARACTERISTICS**

Each playing table for the play of Blackjack shall have a removable metal container known as a "Drop Box" into which must be deposited all duplicate fill slips, original credit slips, and currency received from players for the purchase of chips. Each drop box shall have the following characteristics:

1. Unless only one Blackjack playing table issued at a Gaming Activity, each drop box shall have a number, either attached permanently imprinted, or adhesively backed and impressed thereon, which corresponds to the number of the playing table to which it is attached.
2. Each drop box shall be securely locked to its playing table, and shall have an individually keyed lock.

3. During play, each drop box shall have a money plunger, which shall remain in the drop box slot at all times except when currency and forms are inserted into the drop box.

iii) BLACKJACK CARDS -- PHYSICAL CHARACTERISTICS

All cards used in the play of Blackjack shall have the following characteristics:

1. The cards used in the play of Blackjack shall be four or more complete decks of Blackjack cards, shuffled together and used as one deck. The cards must be dealt as a single packet from one dealing shoe, which shall have the characteristics described in Section IV of this Gaming Control Policy.

iv) BLACKJACK DEALING SHOE -- PHYSICAL CHARACTERISTICS

Each dealing shoe used in the play of Blackjack shall have the following characteristics: it shall have an opaque face plate, a white or transparent base plate, and transparent sides, or a cutout under the base plate of each side, and shall be designed to contain at least four complete decks of Blackjack cards.

v. BLACKJACK CHIPS -- PHYSICAL CHARACTERISTICS

Each chip used in the play of Blackjack shall have the following characteristics.

1. Each chip shall be die cut clay security chip, designed, manufactured, and constructed to prevent, to the maximum extent possible, its counterfeiting.
2. The playing value of each chip, and the name of the Gaming Activity issuing the chip, shall be clearly imprinted on the chip.

f. Distribution of chips to playing tables -- use of fill slips

The following procedures shall govern the distribution of chips to the playing tables, and the use of fill slips, for the play of Blackjack:

1. FILL SLIPS -- CHARACTERISTICS

The fill slips required by the section of this Gaming Control Policy shall be serially pre-numbered forms, which shall be used in sequential order. Fill slips shall be so designed as to permit the recording thereon of the following information; the date and time of the use of the fill slip, the quantity and denomination of

the chips being distributed, the total dollar value of each denomination of chips being distributed, the total dollar value of all the chips being distributed, the number of the playing table to which the distribution is being made, and the name of the cashier making the distribution.

2. **FILL SLIPS -- USE**

A fill slip shall be prepared by a cashier prior to any distribution of chips to any playing table. On the original and duplicate fill slip, all of the information described in section 5.e.1. of this Gaming Control Policy shall be recorded by the cashier distributing the chips. The pit boss, or an employee designated by the pit boss, then shall examine the chips being distributed and the fill slip, and if the fill slip correctly records all information, the pit boss or the designated employee shall sign the fill slip. The original copy of the fill slip shall be retained by the cashier, and the pit boss or the designated employee shall transfer the duplicate copy of the fill slip, together with the chips being distributed, to the playing table. The dealer at the playing table shall then examine the chips being distributed, and if the duplicate copy of the fill slip correctly records all information, the dealer shall sign or initial the duplicate slip, and shall then immediately deposit it in the drop box attached to the playing table. Any fill slips which are voided must be marked "void" on both the original and duplicate copy, shall be signed by the person thus marking the slips, and shall be recorded and retained in the same manner as valid fill slips.

3. **FILL SLIPS - ACCOUNTING**

Records of the serial numbers of all fill slips, and name of the cashier to whom each fill slip is distributed, together with the original and duplicate copy of each fill slip, including each void fill slip, shall be maintained by an employee of the Gaming Activity who is not a cashier, dealer, or pit boss.

g. **Removal of chips from playing tables -- use of credit slips**

The following procedures shall govern the removal of chips from the playing tables, and the use of credit slips, for the play of Blackjack:

1. **CREDIT SLIPS CHARACTERISTICS**

The credit slips required by this section of this Gaming Control Policy shall be serially pre-numbered forms, which shall be used in sequential order. Credit slips shall be so designed as to permit the recording thereon of the following information; the date and time of the credit slip, the quantity and denomination

of the chips being removed, the total dollar value of each denomination of chip being removed, the total dollar value of all the chips being removed, the number of the playing table from which the removal is being made, the name of dealer assigned to the playing table from which the chips are being removed.

2. CREDIT SLIPS -- USE

A credit slip shall be prepared prior to the removal of any chips from any playing table. On the original and duplicate credit slip, all of the information described in Section 5.f.1. of this Gaming Control Policy shall be recorded by the dealer from whose playing table the chips are being removed. The pit boss then shall examine the chips being removed and the credit slip. The original copy of the credit slip shall be retained by the dealer, and shall immediately be deposited in the drop box attached to the playing table, and the pit boss shall transfer the duplicate copy of the credit slip, together with the chips being removed, to the cashier. The cashier shall then examine the chips being removed, and if the duplicate copy of the credit slip correctly records all information, the cashier shall sign or initial the duplicate credit slip and shall retain it. Any credit slips which are voided must be marked "void" on both the original and duplicate copy, and shall be signed by the person thus marking the slips. All credit slips marked "void" shall be recorded and retained in the same manner as valid credit slips.

3. CREDIT SLIPS - ACCOUNTING

Records of the serial numbers of all credits lips, and of the name of the dealer to whom each credit slip is distributed, together with the original and duplicate copy of each credit slip, including each void credit slip, shall be maintained by an employee of the Gaming Activity who is not a cashier, dealer, or pit boss.

h. Blackjack chip bank services

Blackjack chip bank services shall occur in accordance with the following rules and restrictions;

1. SALE OF BLACKJACK SLIPS

Chips shall be sold only at playing tables, and shall be sold only for Canadian currency. No cheques may be accepted for the purchase of chips. The value at which chips are sold and redeemed must be conspicuously posted by the Gaming Activity, and shall be visible to each person at the time chips are purchased.

2. PROCEDURES FOR ACCEPTING CASH

Each dealer accepting currency for chips at a playing table shall spread such currency on the surface of the playing table, in full view both of the player who presented it and of the pit boss assigned to the playing table. The dealer shall then announce the amount of such currency, in a tone of voice loud enough to be heard by the player who presented the currency and the pit boss assigned to the playing table.

3. EXCHANGE OF CHIPS -- PLACEMENT OF CURRENCY IN DROP BOX

Immediately after performing the procedures described in this section, the dealer accepting currency shall give to the player who presented it an equivalent amount of chips, and shall remove the currency received from the surface of the playing table and place it into the drop box attached thereto.

4. DISPOSITION OF CURRENCY -- ACCESS TO DROP BOX

All currency received for chips at playing tables must be kept completely separate and apart from all other monies received by a Gaming Activity until such currency has been counted in accordance with the provisions of this Gaming Control Policy. No person, other than the count team described in this Gaming Control Policy, shall have access to the contents of any drop box.

5. REDEMPTION OF CHIPS

Each Gaming Activity shall redeem Blackjack chips for cash in the value for which they were sold, provided that such chips were obtained lawfully and in accordance with the provisions of this Gaming Control Policy. The cash bank from which funds are obtained to redeem chips shall be completely separate and apart from all other monies held by the Gaming Activity.