



KENNY C. GUINN  
Governor

STATE OF NEVADA  
**GAMING CONTROL BOARD**

1919 E. College Parkway, P.O. Box 8003, Carson City, Nevada  
89702  
555 E. Washington Ave., Suite 2600, Las Vegas, Nevada 89101  
3650 South Pointe Cir., P.O. Box 31109, Laughlin, Nevada  
89028  
557 W. Silver St., Suite 207, Elko, Nevada 89801  
6980 Sierra Center Parkway, Suite 120, Reno, Nevada 89511

DENNIS K. NEILANDER, *Chairman*  
BOBBY L. SILLER, *Member*  
SCOTT SCHERER, *Member*

September 23, 2004

Carson City  
(775) 684-7770  
Fax: (775) 684-7787

**TO: ALL GROUP II NONRESTRICTED LICENSEES AND INTERESTED PERSONS**

**RE: ADOPTION OF REVISED INTERNAL CONTROL PROCEDURES**

On April 23, 2004, the Gaming Control Board distributed to all Group II nonrestricted licensees and interested persons proposed revisions to the Internal Control Procedures (ICPs). Following the distribution of these materials, the Board received and reviewed oral and written comments submitted by licensees and other interested parties. Based on the comments received, the Board made a few additional changes to the proposed ICPs.

On August 25, 2004, the Gaming Control Board distributed to all Group II nonrestricted licensees and interested persons the "Revisions to the Proposed Internal Control Procedures" schedule, which contained the additional changes. The Board once again encouraged the submission of written comments, concerns or suggestions regarding the proposed ICP revisions. No additional comments were received by the Board.

Accordingly, pursuant to Regulation 6.100(4), I am informing you of my decision to adopt the revised versions of the Internal Control Procedures. Please be advised that the Manual Keno ICPs are being eliminated at this time. Also be advised that during the adoption of amendments to Regulation 14 and the Technical Standards in May 2003, the Nevada Gaming Commission decided to prohibit the use of debit cards at slot machines until this issue is further studied and appropriate regulations adopted. The Slots ICPs addressing the electronic funds transfers through the use of a debit card have not been removed in the event the Nevada Gaming Commission allows for these types of transactions in the future.

The sections of the adopted ICPs can be obtained from the Board's website at <http://gaming.nv.gov>. They can also be obtained at either the Carson City or Las Vegas Tax and License Division offices.

As provided in Regulation 6.100(5), any Group II nonrestricted licensee has thirty days from the date of this letter in which to object to any newly adopted or modified

## Adoption of Revised ICPs

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internal control procedures. Objections must be submitted in writing to the Nevada Gaming Commission at 1919 East College Parkway, Carson City, Nevada 89706. Objections should contain a reference to the procedure, by section and number, and should identify specific concerns. Detailed descriptions of concerns will be necessary in order for the Commission to evaluate any objections.

If your objections or concerns with a particular ICP are unique to your operation and would not benefit all Group II licensees, please consider the provisions of Regulation 6.100(7). This paragraph of the regulation allows a licensee to seek the Board Chairman's approval of variations from the ICPs when a licensee's alternative procedures satisfy the objectives of internal control described in Regulation 6.100(1).

If no objections are received, it is my intent to have the effective date of the new versions of the standards be January 1, 2005.

Licensees who have received variations from previous versions of the ICPs should compare those variations to the revised versions of the ICPs to determine if the standard number changed, or in some instances, the standard was eliminated. All variations previously granted are still in effect (if applicable), unless specifically notified by the Board. Additionally, all associated equipment approvals granted by the Board in the past that refer to procedures in specific versions of the Internal Control Procedures should now be applied to the current version.

Prior to January 1, 2005, a notice will be sent indicating the official date the adopted ICPs are effective. That notice and the final version of the ICPs, absent of denoted changes, will also be posted on the Board's website.

If you have any questions on the ICP adoption process or any of the information discussed in this letter, please contact Supervisor Kevin Finley at (702) 486-2008.

Sincerely,

Dennis K. Neilander  
Chairman

DKN/sh

cc: Bobby L. Siller, Board Member  
Scott Scherer, Board Member  
Steve Hixon, Chief, Tax and License Division  
Tax and License Division – Las Vegas  
Records and Research Services