

OHIO CASINO CONTROL COMMISSION

RESOLUTION 2012-37

WHEREAS, Article XV, Section (6)(C)(4) of the Ohio Constitution created the Ohio Casino Control Commission (“Commission”) to ensure the integrity of casino gaming by, among other things, licensing and regulating all gaming authorized by Article XV, Section (6)(C) of the Ohio Constitution;

WHEREAS, R.C. 3772.03 authorizes the Commission to adopt regulations as are necessary for completing the functions of licensing, regulating, investigating, and penalizing, among others, casino operators, management companies, and holding companies;

WHEREAS, R.C. 3772.03(D)(1) and (27) mandate that the Commission prescribe rules to, among other things, prevent practices detrimental to the public and provide for any other thing necessary and proper for successful and efficient regulation of casino gaming under R.C. Chapter 3772, respectively;

WHEREAS, A.C. 3772-10-02(A) requires that each casino operator submit, in writing, its casino operations internal control plan, as detailed in A.C. Chapter 3772-10, to the Commission for review and approval at least sixty days before the operator’s anticipated opening;

WHEREAS, A.C. 3772-10-02(A) prohibits a casino operator from opening a casino facility to the public absent Commission approval of the casino operations internal control plan;

WHEREAS, A.C. Chapter 3772-10 requires the following information be included as part of the casino operations internal control plan submission:

- (A) Casino operator’s organizational structure, as detailed in A.C. 3772-10-03;
- (B) Controls for preparing accounting records, as detailed in A.C. 3772-10-04;
- (C) Procedures for using and retaining forms, records, and documents, as detailed in A.C. 3772-10-05;
- (D) Controls for standard financial reports, as detailed in A.C. 3772-10-06;
- (E) Controls for annual and other audit reports, as detailed in A.C. 3772-10-07;
- (F) Controls for meter readings and the preparation of related statistical reports, as detailed in A.C. 3772-10-08;
- (G) Controls for the authorization, issuance, recording, and auditing of complimentary, including cash and non-cash gifts, as detailed in A.C. 3772-10-09;
- (H) Controls for the acceptance of personal checks, as detailed in A.C. 3772-10-10;

- (I) Controls for the acceptance, verification, accounting for, and sending of wire transfers, as detailed in A.C. 3772-10-11;
- (J) Controls for the acceptance and verification of cash equivalents, as detailed in A.C. 3772-10-12;
- (K) Controls for the receipt and withdrawal of patron deposits, as detailed in A.C. 3772-10-13;
- (L) Internal audit standards, as detailed in A.C. 3772-10-14;
- (M) Information technology standards, as detailed in A.C. 3772-10-15;
- (N) Controls for and security of the cashier's cage, main bank/vault, and count rooms, as detailed in A.C. 3772-10-16;
- (O) Accounting controls for the cage and main bank/vault, as detailed in A.C. 3772-10-17;
- (P) Physical requirements and controls for the transportation of table drop boxes and slot bill validator canisters, as detailed in A.C. 3772-10-18;
- (Q) Procedures for drop box counting, as detailed in A.C. 3772-10-19;
- (R) Procedures for processing unsecured currency, vouchers, tickets, or coupons found inside a bill changer but outside a bill validator canister, as detailed in A.C. 3772-10-20;
- (S) Procedures for paying jackpots that are not paid directly from a slot machine, as detailed in A.C. 3772-10-21;
- (T) Procedures for handling tips and gratuities, as detailed in A.C. 3772-10-22;
- (U) Procedures for extending credit to patrons, as detailed in A.C. 3772-10-23;
- (V) Procedures for preparing and maintaining license employee signature cards, as detailed in A.C. 3772-10-24;
- (W) Procedures for handling unclaimed winnings, as detailed in A.C. 3772-10-25; and
- (X) Procedures for securing and accurately tracking keys and locks, as detailed in A.C. 3772-10-26;

WHEREAS, R.C. 3772.03(D)(8) mandates, among other things, that the Commission identify the casino gaming that is permitted, identify the gaming supplies, devices, and equipment that are permitted, and define the area in which the permitted casino gaming may be conducted;

WHEREAS, R.C. 3772.03(D)(9) mandates that the Commission adopt regulations regarding tournament play in any casino facility;

WHEREAS, A.C. 3772-10-02(B) and 3772-11-02 require that each casino operator develop and implement an internal control plan for table games that includes, at a minimum, the following:

- (A) A detailed description of all procedures required by A.C. Chapter 3772-11 and any other regulations required to operate the games with integrity, as provided under A.C. 3772-11-02(A); and
- (B) A detailed description of the operations of a table games department, as provided under A.C. 3772-11-02(B);

WHEREAS, Rock Ohio Caesars Cleveland LLC (d/b/a Horseshoe Casino Cleveland) submitted its casino operations and table games internal control plans for the Commission's consideration;

WHEREAS, Rock Ohio Caesars Cleveland LLC (d/b/a Horseshoe Casino Cleveland) submitted all other information required by the Commission regarding its casino operations and table games, if any; and

WHEREAS, the Commission reviewed all submitted information and materials and considered the matter at its public meeting on May 2, 2012;

NOW, THEREFORE, BE IT RESOLVED by the Commission that Rock Ohio Caesars Cleveland LLC (d/b/a Horseshoe Casino Cleveland) casino operations and table games internal control plans are **APPROVED**.

BE IT FURTHER RESOLVED, that Resolution 2012-37 does not in any way affect, negate, or otherwise absolve the requirement that Rock Ohio Caesars Cleveland LLC (d/b/a Horseshoe Casino Cleveland) obtain the Commission's Executive Director's (or the designee thereof) final approval of each conditional licensing item in accordance with A.C. 3772-10-02.

BE IT FURTHER RESOLVED, that Resolution 2012-37 does not in any way affect, negate, or otherwise absolve Rock Ohio Caesars Cleveland LLC (d/b/a Horseshoe Casino Cleveland) from its duty to seek Commission approval to amend its casino operations or table games internal control plans in accordance with A.C. 3772-10-28.

BE IT FURTHER RESOLVED, that Resolution 2012-37 does not restrict or limit the Commission's future exercise of authority and discretion with respect to imposing additional conditions or taking further action with respect to Rock Ohio Caesars Cleveland LLC (d/b/a Horseshoe Casino Cleveland) under R.C. Chapter 3772 and the rules adopted thereunder.

Adopted: