

PROPOSED AMENDMENTS TO
NEVADA GAMING COMMISSION REGULATION 6.090 AND 6.100

Draft Dated: 12/19/2025

PURPOSE STATEMENT: To amend Nevada Gaming Commission (“NGC”) Regulations 6.090(1) and 6.100(1) to add a reference to Chapter 368A of the Nevada Revised Statutes (“NRS”); To amend NGC Regulations 6.090(2), (7)-(8), and (10)-(13) to remove the requirement that a licensee must submit a copy of its written system of internal control to the Nevada Gaming Control Board (“Board”), but instead provide it to the Board upon request; To amend NGC Regulation 6.090(9) to provide that the independent accountant engaged by the licensee need no longer perform any procedures or prepare reports required in the subsection in relation to the licensee’s compliance with the minimum internal control standards regarding Nevada’s Live Entertainment Tax (“LET”) (NRS 368A); To amend NGC Regulation 6.090(15) to provide that the licensee’s internal auditor need no longer perform the procedures or prepare the reports required under the subsection in regard to LET; To amend NGC Regulations 6.115(3) and (4) to adjust language to reflect the repeal of the requirement for licensees to submit copies of the written systems; And to take such additional actions as may be necessary and proper to effectuate this stated purpose.

EFFECTIVE DATE: Upon adoption by the Nevada Gaming Commission.

EXPLANATION: Matter in *blue italics* is new language; matter between ~~red brackets with single strikethrough~~ is material to be omitted.

REGULATION 6

ACCOUNTING REGULATIONS

6.090 Internal control for Group I licensees. As used in this section, “licensee” means a Group I licensee and “Chair” means the Chair or other member of the Nevada Gaming Control Board.

1. Each licensee shall establish administrative and accounting procedures for the purpose of determining the licensee’s liability for taxes and fees under chapters *368A*, 463, and 464 of NRS and for the purpose of exercising effective control over the licensee’s internal fiscal affairs. The procedures must be designed to reasonably ensure that:

(a) Assets are safeguarded;

- (b) Financial records are accurate and reliable;
- (c) Transactions are performed only in accordance with management's general or specific authorization;
- (d) Transactions are recorded adequately to permit proper reporting of gaming revenue and of fees and taxes, and to maintain accountability for assets;
- (e) Access to assets is permitted only in accordance with management's specific authorization;
- (f) Recorded accountability for assets is compared with actual assets at reasonable intervals and appropriate action is taken with respect to any discrepancies; and
- (g) Functions, duties, and responsibilities are appropriately segregated and performed in accordance with sound practices by competent, qualified personnel.

2. Each licensee and each applicant for a nonrestricted license shall describe, in such manner as the Chair may approve or require, its administrative and accounting procedures in detail in a written system of internal control. Each ~~licensee and~~ applicant for a license shall submit a copy of its written system to the Board. Each *licensee shall maintain a copy of the licensee's written system and provide it to the Board upon request.* A written system must include:

- (a) An organizational chart depicting segregation of functions and responsibilities;
- (b) A description of the duties and responsibilities of each position shown on the organizational chart;
- (c) A detailed, narrative description of the administrative and accounting procedures designed to satisfy the requirements of subsection 1;
- (d) A written statement signed by the licensee's chief financial officer (or comparable position) and either the licensee's chief executive officer (or comparable position) or a licensed owner attesting that the system satisfies the requirements of this section; and
- (e) Such other items as the Chair may require.

3. The Chair shall adopt and publish minimum standards for internal control procedures that in the Chair's opinion satisfy subsection 1. At least 45 days prior to adopting or revising minimum standards, the Chair shall:

- (a) Publish notice of the proposed action by posting the proposed change or revision on the Board's website;
- (b) Mail notice of the posting of the proposed minimum standards or revision on the Board's website and a copy of this section of Regulation 6 to every Group I licensee and every person who has filed a request therefor with the Commission; and
- (c) Provide a copy of the proposed minimum standards or revision to the Commission.

4. Prior to adopting or revising the minimum standards, the Chair shall consider all written statements, arguments, or contentions submitted by interested parties within 30 days of service of the notice provided for in subsection 3.

5. The Chair shall send written notice that he or she has adopted standards pursuant to subsection 3 to all Group I licensees and to every person who has filed a request therefor with the Commission.

6. Not later than 30 days after service of written notice that the Chair has adopted or revised the minimum standards, any Group I licensee may object to the minimum standards or revisions by filing a written objection with the Commission. If a licensee files an objection, the effective date of the standards or revisions is stayed. The Commission may, on its own initiative, review the minimum standards or revisions adopted by the Chair and may stay the effective date of the standards or revisions. If no objections are filed within 30 days, or the Commission does not stay the effective date in order to review the minimum standards or revisions, the minimum standards or revisions shall become effective. If objections to particular portions of the minimum standards or revisions are filed, the portions of the minimum standards or revisions not objected to shall become effective upon expiration of the 30 days. If the Commission fails to sustain an objection within 60 days of its filing, the objection will be deemed denied and the minimum standards shall become effective upon expiration of the 60 days. If the Commission sustains the objection, the Chair shall revise the minimum standards to reflect the order of the Commission. The Chair shall send written notice of the effective date of the standards to all Group I licensees and every person who has filed a request therefor with the Commission.

7. Not later than 30 days after service of written notice that the minimum standards adopted or revised pursuant to this section are effective, each licensee whose procedures are affected by the minimum standards or revisions shall amend its written system~~[, submit a copy of the written system as amended to the Board.]~~, and comply with the standards and system as amended. The Chair, in the Chair's sole and absolute discretion, may extend the time for complying with this subsection.

8. The licensee may not implement a system of internal control procedures that does not satisfy the minimum standards unless the Chair, in the Chair's sole discretion, determines that the licensee's proposed system satisfies subsection 1, and approves the system in writing. Within 30 days after a licensee receives notice of the Chair's approval of procedures that satisfy the requirements of subsection 1, but that do not satisfy the minimum standards, the licensee shall comply with the approved procedures~~[, and amend its written system accordingly, and submit to the Board a copy of the written system as amended and a written description of the variations.]~~. *The amended system must be* signed by the licensee's chief financial officer and either the licensee's chief executive officer or a licensed owner.

9. ~~[Each]~~ *Except as otherwise provided herein, each* licensee shall require the independent accountant engaged by the licensee to examine the financial statements or to review the licensee's financial statements to submit to the licensee one copy of

a written report of the compliance of the procedures and written system with the minimum internal control standards. Using the criteria established by the Chair, the independent accountant shall report each event and procedure discovered by or brought to the accountant's attention that the accountant believes does not satisfy the minimum standards or variations from the standards that have been approved by the Chair pursuant to subsection 8. Not later than 150 days after the end of the licensee's business year, the licensee shall submit a copy of the accountant's report or any other correspondence directly relating to the licensee's systems of internal control to the Board accompanied by the licensee's statement addressing each item of noncompliance noted by the accountant and describing the corrective measures taken. Unless the Chair approves otherwise in writing, in the event of a license termination, change in business entity, or a change in the percentage of ownership of more than 20 percent, the licensee or former licensee shall, not later than 150 days after the event, submit a copy of the accountant's report or any other correspondence directly relating to the licensee's systems of internal control to the Board accompanied by the licensee's statement addressing each item of noncompliance noted by the accountant and describing the corrective measures taken covering the period since the period covered by the previous report. If a license termination, change in business entity, or a change in the percentage of ownership of more than 20 percent occurs within 150 days after the end of a business year for which a report has not been submitted, the licensee may submit a report covering both the business year and the final period of business. *An independent accountant engaged by the licensee pursuant to this subsection need not perform any procedures or prepare any reports relating to the licensee's compliance with the minimum standards established by the Chair pursuant to subsection 8 regarding the tax imposed in chapter 368A of NRS.*

10. Before adding or eliminating a counter game; eliminating all table games; adding a table game at a gaming establishment not offering table games; adding any computerized system that affects the proper reporting of gross revenue; adding any computerized system of betting at a race book or sports pool; or adding any computerized system for monitoring slot machines or other games, or any other computerized associated equipment, the licensee must:

- (a) Amend its accounting and administrative procedures and its written system of internal control to comply with the minimum standards;
- (b) ~~Submit to the Board a copy of the written system as amended, and a written description of the amendments signed by the licensee's chief financial officer and either the licensee's chief executive officer or a licensed owner;~~
- (c) Comply with any written requirements imposed by the Chair regarding administrative approval of computerized associated equipment; and

~~[(d)] (c)~~ After paragraphs (a) ~~through (c)~~ and (b) have been complied with, implement the procedures and written system as amended.

11. Each licensee shall annually ~~report any amendments to the licensee's procedures and~~ amend its written system *of internal control when there is a change to its accounting and administrative procedures*, not reported pursuant to Regulation 6.090(10), ~~that have been made since the previous annual report~~ to comply with the minimum standards. The report must ~~include a complete copy of the written system as amended and a written description of the amendments~~ be signed by the licensee's chief financial officer or comparable position.

12. If the Chair determines that a licensee's administrative or accounting procedures or its written system does not comply with the requirements of this section, the Chair shall so notify the licensee in writing. Within 30 days after receiving the notification, the licensee shall amend its procedures and written system accordingly~~, and shall submit a copy of the written system as amended and a description of any other remedial measures taken~~.

13. Each licensee shall comply with its written system of internal control ~~submitted pursuant to subsection 2~~ as it relates to compliance with the minimum standards, variations from the minimum standards approved pursuant to subsection 8, and Regulation 14 associated equipment approvals.

14. Failure to comply with subsection 13 is an unsuitable method of operation.

15. ~~Using~~ Except as otherwise provided herein, using guidelines, checklists, and other criteria established by the Chair, the licensee's internal auditor shall perform observations, document examinations, and inquiries of employees to determine compliance with applicable statutes, regulations, and minimum internal control standards. One copy of the internal auditor's report summarizing all instances of noncompliance and management responses must be submitted to the Board and must include all work required to be performed during each six-month period of the licensee's business year along with any additional procedures that were performed. Noncompliance noted in the first half of the business year must be submitted to the Board within 120 days after the end of such ~~six month~~ six-month period. Noncompliance noted in the second half of the business year must be submitted to the Board within 150 days after the end of such ~~six month~~ six-month period. *The licensee's internal auditor need not perform any of the procedures or prepare any of the reports required in this subsection in regard to the tax imposed in chapter 368A of NRS.*

6.100 Internal control procedures for Group II licensees. As used in this section "licensees" mean Group II licensees and "Chair" means the Chair or other member of the Nevada Gaming Control Board.

1. The Chair shall prepare and publish internal control procedures that in the Chair's opinion establish administrative and accounting procedures for the purpose of determining the licensee's liability for taxes and fees under chapters [368A](#), 463, and 464 of NRS and for the purpose of exercising effective control over the licensee's internal fiscal affairs.

2. At least 45 days prior to adopting or revising the internal control procedures, the Chair shall:

(a) Publish notice of the proposed action by posting the proposed change or revision on the Board's website;

(b) Mail notice of the posting of the proposed internal control procedures or revisions on the Board's website and a copy of this section of Regulation 6 to every Group II licensee and every person who has filed a request therefor with the Commission; and

(c) Provide a copy of the proposed internal control procedures to the Commission.

3. Prior to adopting or revising the internal control procedures, the Chair shall consider all written statements, arguments, or contentions submitted by interested parties within 30 days of service of the notice provided for in subsection 2.

4. The Chair shall send written notice of the adoption of the internal control procedures to all Group II licensees and every person who has filed a request therefor with the Commission.

5. Not later than 30 days after service of written notice that the Chair has adopted or revised the internal control procedures, any Group II licensee may object to the internal control procedures by filing a written objection with the Commission. If a licensee files an objection, the effective date of the internal control procedures is stayed. The Commission may, on its own initiative, review the internal control procedures adopted by the Chair and may stay the effective date of the standards or revisions. If no objections are filed within 30 days, or the Commission does not stay the effective date in order to review the internal control procedures, the internal control procedures shall become effective. If objections to particular portions of the internal control procedures are filed, the portions of the internal control procedures not objected to shall become effective upon expiration of the 30 days. If the Commission fails to sustain an objection within 60 days of its filing, the objection will be deemed denied and the internal control procedures shall become effective upon expiration of the 60 days. If the Commission sustains the objection, the Chair shall revise the internal control procedures to reflect the order of the Commission. The Chair shall send written notice of the effective date of the internal control procedures to all Group II licensees and every person who has filed a request therefor with the Commission.

6. Not later than 30 days after service of written notice that the internal control procedures adopted or revised pursuant to this section are effective, each licensee

shall comply with the procedures. The Chair, in the Chair's sole and absolute discretion, may extend the time for complying with this subsection.

7. A licensee may not implement internal control procedures that deviate from the published internal control procedures unless the deviations are approved in writing by the Chair.

8. Failure to follow the internal control procedures issued by the Chair, or approved deviations from the procedures, is an unsuitable method of operation.

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6.115 Uncollected baccarat commissions.

1. If a licensee does not collect baccarat commissions due from a patron at the conclusion of play and elects to waive payment, such action must be authorized and documented in accordance with subsection 2 hereof.

2. Concurrently with the decision to not collect the baccarat commission, the licensee must record, in such manner and using such preprinted, prenumbered forms as the Chair has approved:

(a) Date, shift and time the licensee determined to not collect the baccarat commission;

(b) The amount of the baccarat commission not collected;

(c) The baccarat table number.

(d) Patron name, if known;

(e) The dealer's signature; and

(f) A baccarat supervisor's signature.

3. Such forms shall be sent to the accounting department at least every 24 hours and reconciled numerically to account for all forms. A form may be used to record more than one transaction; however each transaction must indicate all of the above required signatures. Descriptions of the forms and procedures utilized must be included in the licensee's ~~submitted~~ *written* system of internal control.

4. An uncollected baccarat commission that is not waived in accordance with this regulation shall be documented by a credit instrument that clearly indicates it represents an uncollected baccarat commission, and that conforms to all documentation and procedural requirements of the licensee's ~~submitted~~ *written* system of internal control.

5. Failure to comply with these regulations is an unsuitable method of operation, but shall not subject the licensee to any payment of taxes or fees on any baccarat commission not collected.