



STATE OF MICHIGAN  
**MICHIGAN GAMING CONTROL BOARD**  
DETROIT

**GRETCHEN WHITMER**  
GOVERNOR

**RICHARD S. KALM**  
EXECUTIVE DIRECTOR

**MEMORANDUM**

DATE: April 14, 2021

TO: Internet Gaming Operators, Internet Gaming Platform Providers, and Internet Gaming Suppliers

CC: Richard Kalm, Executive Director  
David Murley, Deputy Director, Indian Gaming & Legal Affairs  
Kurt Steinkamp, Deputy Director, Licensing, Investigations, & Audit  
Henry Williams, Deputy Director, Casino Operations

FROM: David Hicks, Internet Gaming Manager

RE: Live Game Regulatory Framework

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This memo applies to live games conducted under the Lawful Internet Gaming Act (LIGA), 2019 PA 152. Without limitation, the following are subject to this memo:

- (1) Internet gaming operators.
- (2) Internet gaming platform providers.
- (3) Internet gaming suppliers which include live game service providers.
- (4) Vendors registered under the LIGA.

This memo provides the industry with a sound regulatory framework for live games conducted under LIGA.

**Assumptions**

This regulatory framework assumes that live dealer games will be conducted through internet gaming platforms where the internet gaming platform handles a significant portion of the gaming activity, including internet wagering accounts (patron account management), geolocation, know your customer, payment processing, patron complaints, responsible gaming, etc. The live dealer game outcome will be communicated to the internet gaming platform which then handles all other patron interaction. This assumption is consistent with rule requirements and related definitions.

All live dealer games will be conducted in a secure live game environment with no in-person wagering. Conducting in-person wagering (dual play) will require legal analysis to determine whether live games can be conducted simultaneously under LIGA and either the Michigan Gaming Control and Revenue Act or the Indian Gaming Regulatory Act and the compacts. Regulation and controls will also need to be

implemented to address the specific risks associated with in-person wagering.

### **Primary Administrative Rule Requirements**

R432.632(a)(2): An internet gaming platform provider or internet gaming supplier must submit all internet games, including, but not limited to, slot machine, table, live games, progressives, and peer-to-peer games proposed for use by any internet gaming operator to the board or to an independent lab approved by the board for evaluation.

R432.633(5): All internet games for proposed use must meet or exceed the technical standards adopted in R432.633(2) (GLI-19, v3.0). Internet gaming operators, internet gaming platform providers, and internet gaming suppliers are prohibited from offering any internet game without written approval by the board. An internet gaming platform provider and internet gaming supplier is responsible for all costs associated with testing and obtaining such approvals.

R432.634(1): Unless otherwise approved by the board in writing, an internet gaming operator and its internet gaming platform provider must place a server or other equipment that is capable of receiving internet wagers in this state. The location selected must have adequate security, protections, and controls over the servers or other equipment that is capable of receiving internet wagers, including those adopted in R 432.633(2) (GLI-19, v3.0). The internet gaming operator and its internet gaming platform provider must provide the board with information on the location of all servers and other equipment.

R432.639b(1): An internet gaming operator or its internet gaming platform provider must obtain written board approval to conduct live games or other similar type games. Unless otherwise approved by the board in writing, the live game environment used to conduct live games or similar games must be located in this state in a location approved by the board.

R432.639b(2): The live game service provider may be an internet gaming operator, internet gaming platform provider, or an internet gaming supplier if approved by the board. The live game service provider, shall adopt, implement, and maintain all technical standards adopted in R 432.633(2) (GLI-19, v3.0) including the live game service provider requirements contained in Appendix C.6 of the referenced technical standards.

### **GLI-19, V3.0, Appendix C.6**

GLI-19, v3.0, Appendix C.6 includes requirements for live game environment security, surveillance and recording, simulcast control servers, live game equipment and consumables (cards, dice, etc.).

### **Live Game Environment Security**

The live game environment shall be clearly defined and demarcated and have appropriate physical security controls. Secure areas, live game consumables, and live game equipment shall be protected by appropriate entry controls and security procedures to ensure that only authorized staff members are allowed access according to the following guidelines:

- a) In the case where live games occur in a gaming venue during times that are open to the public, but in a gaming area that is not open for game play by in-person patrons, the live game environment security shall include, but is not limited to, all of the following:

- i. The areas where the live games occur, the whole of the area near the live game equipment, areas where consumables are stored or prepared for use, and related accesses shall be at least protected by delimitation and alert barriers and supervised by the security staff.
  - ii. The live game equipment and consumables shall be subject to access controls (both physical and logical) that prevent unauthorized access to the live game equipment and consumables.
- b) In the case where the live games occur in a private gaming studio not open to the public or otherwise available for game play by in-person patrons, the live game environment security shall include, but is not limited to, all of the following:
  - i. The areas where the live games occur, the whole of the area near the live game equipment, areas where consumables are stored or prepared for use, and the related accesses shall be protected by physical barriers and the related accesses protected through access security systems.
  - ii. Access points such as delivery and loading areas and other points where unauthorized persons may enter the areas where the live games occur and consumables may be stored or prepared for use shall be controlled and isolated from operations areas to avoid unauthorized access.
  - iii. The live game equipment and consumables shall be subject to access controls (both physical and logical) that prevent unauthorized access to the live game equipment and consumables.
  - iv. Access points shall be actively monitored by security staff.

### **Surveillance and Recording**

The live game service provider must install, maintain, and operate a surveillance system that has the capability to monitor and record continuous unobstructed views of all live game play and areas where consumables are stored or prepared for use.

- a) A continuous recording shall be made of all the games played which includes, but is not limited to, all of the following:
  - i. Identifiable and distinguishable information necessary to adequately reconstruct each game, consistent with the applicable recall requirements provided for under GLI-19, v3.0, section 4.12.2, entitled “Last Play Information Required”, which are not displayed by the internet gaming platform itself. The game recall shall display information including, but is not limited to, all of the following, as applicable:
    - The date and time the game was played.
    - The denomination played for the game, if a multi-denomination game type.
    - The display associated with the final outcome of the game, either graphically or by a clear text description.
    - The funds available for wagering at the start of play and/or at the end of play.
    - Total amount wagered, including any incentive credits.
    - Total amount won.

- Any non-wager purchase that occurred between the start of play and the end of play.
  - Rake, commission, or fees collected.
  - The results of any patron choices involved in the game outcome.
  - The results of any intermediate game phases, such as double-up/gamble or bonus/feature games.
  - If a progressive jackpot and/or incrementing jackpot was won, an indication that the jackpot was awarded.
  - Any patron advice that is offered to the patron for games with skill.
- ii. Information necessary to determine the date and time of each game to an accuracy of one second relative to the clock used by the system.
  - iii. Information necessary to determine the sequence of games relative to each other.
- b) Procedures shall be in place to ensure that the recording meets all of the following minimum conditions:
- i. Covers the defined live game environment and areas where consumables are stored or prepared for use with sufficient detail to confirm whether all game rules and relevant procedures were followed and to identify any discrepancies.
  - ii. Is captured in such a way that precludes interference or any deletion.
  - iii. Can be reviewed by the operator, platform provider, and the board in the event of a patron complaint/dispute.
  - iv. Is kept for at least ninety days or as otherwise determined by the board. Recordings shall be maintained of any event that is subject to any investigation until the completion of the investigation.
- c) Procedures shall be in place to ensure that surveillance and recordings are actively monitored by security personnel.

### **Simulcast Control Servers**

The live game service provider shall utilize simulcast control servers for recording all gaming activity and results. The live game service provider may use their own surveillance camera and split live feed to the simulcast control servers, or there may be a separate network of video involved. The simulcast control servers shall do all of the following, without limitation:

- a) Provide the patron with real-time audio/visual access to the live game being played, which must include, but is not limited to, all of the following:
  - i. Any information required in GLI-19, v3.0, particularly under sections entitled “Game Information and Rules of Play” and “Information to be Displayed.”
  - ii. The actions of the gaming attendant and, where applicable, other patrons.
  - iii. Date and time at the live game studio.
  - iv. Game identification/table number and location.
- b) Provide each patron with an equivalent quality video/audio feed that meets all of the following minimum conditions:
  - i. This equivalence shall be measured and verified whenever communications are initiated, including reconnection due to signal interruptions or re-initiation when the signal was severed.

- ii. A minimum signal connection requirement shall be established, enforced and disclosed to the patron.
- c) Prevent anyone from accessing the live game outcome prior to finalizing a wager.
- d) Record game results before posting to the internet gaming platform.
- e) Be equipped with a mechanism for an authorized employee to void game results, if necessary. The conditions under which a game may be voided must be in accordance with applicable requirements of LIGA and the related rules and must be clearly detailed in internal controls and operating procedures.

### **Live Game Equipment and Consumables – General Requirements**

The live game service provider shall submit for board review a listing of all live game equipment and consumables that will be utilized to conduct live games and the internet gaming suppliers or vendors that will be supplying such items.

The live game service provider must assign a unique asset number for each live game equipment item.

The live game service provider must maintain an inventory of each live game equipment item. The live game service provider shall provide the inventory to the board upon request.

The inventory must include all of the following information:

- a) The asset number assigned by the live game service provider.
- b) The type of game for which the live game equipment item is designed and used.
- c) The location of each live game equipment item.
- d) The manufacturer, supplier, or vendor of the live game equipment item.

Unless otherwise authorized by the board, approved live game equipment and consumables may only be installed and used to provide live game services to a licensed operator and its licensed platform provider.

Access to live game equipment and consumables must be strictly controlled to prevent unauthorized access.

### **Live Game Equipment**

The live game service provider shall provide a secure location for the placement, operation, and usage of live game equipment, including simulcast control servers, gaming servers, and communications equipment. Security policies and procedures shall be in place and reviewed periodically to ensure that risks are identified and mitigated. Live game equipment shall meet all of the following minimum requirements:

- a) Live game equipment shall be installed according to a defined plan and records of all installed live game equipment shall be maintained.
- b) Live game equipment shall be sited or protected to reduce risk from all of the following, without limitation:
  - i. Environmental threats and hazards.
  - ii. Opportunities for unauthorized access.

- iii. Power failures.
- iv. Other disruptions caused by failures in supporting utilities.
- c) Access to the live game equipment by the gaming attendant (dealer, croupier, etc.) shall be controlled by a secure logon procedure or other secure process to ensure that only authorized gaming attendants are allowed access. All modifications to configuration settings of the live game equipment shall follow a secure process and be performed in accordance with approved change management and related release note processes.
- d) A user session, where supported by live game equipment, shall be initiated by the gaming attendant logging in to their user account using their secure username and password or an alternative means for the gaming attendant to provide identification information. The user session must meet the following minimum requirements:
  - i. All available options presented to the gaming attendant shall be tied to their user account.
  - ii. If the live game equipment does not receive input from the gaming attendant within five minutes, or a period specified by the board, the user session shall time out or lock up, requiring the gaming attendant to re-establish their login in order to continue.
- e) Live game equipment shall be correctly maintained, inspected and serviced at regular intervals by designated staff to ensure that it is free from defects or mechanisms that could interfere with its proper operation or integrity.
- f) Prior to disposal or re-use, live game equipment containing storage media shall be checked to ensure that any licensed software and other sensitive information has been removed or securely overwritten (i.e., not just deleted).
- g) Since the live game wagering will be conducted by the operator and its platform provider and the conduct of the live games will flow through the internet gaming platform, R432.639(1) of the administrative rules is applicable to live game equipment. R432.639(1) provides that an internet gaming operator, its internet gaming platform provider, or both must adopt, implement, and maintain technical security standards (controls) that meet or exceed those adopted in R432.633(2) (GLI-19, v3.0). An operator and its platform provider shall amend their internal controls, as needed, to address the various aspects of live games. Live game service providers shall review this section of the rules and ensure that all relevant technical security standards (controls) are adopted, implemented, and maintained within their internal controls and procedures.

Integration testing of live game equipment to all internet gaming platforms that will utilize the live game service provider shall be performed by an independent test lab (ITL) authorized by the board. The live game service provider shall provide the board with all applicable integration testing results.

Platform providers and live game service providers must submit products that require approval to an authorized ITL for testing to Michigan's technical requirements. The ITL will provide the platform provider or live game service provider with the results of testing and a certification letter upon completion of its evaluation. Live game equipment includes, but is not limited to, live dealer games, live game systems, roulette wheels (whether automated or non-automated), card shufflers, automated card

readers, and automated dice shakers/throwers. Applicable GLI or equivalent technical standards to test against include, but are not limited to, the following:

- a) Live Dealer Games – GLI 19, v3.0.
- b) Live Game Systems – GLI 19, v3.0.
- c) All live game equipment used in conjunction with card, roulette, dice, and wheel games, such as automated card readers, roulette wheels, and automated dice shakers/throwers, shall be tested as part of the applicable game.
- d) Card Shufflers – GLI 29, v1.0, or an equivalent standard.

The platform provider or live game service provider may then prepare a submission to the board using the internet gaming software and hardware submission forms and related instructions available on the board's website at [https://www.michigan.gov/mgcb/0,4620,7-351-97573\\_99843-538743--,00.html](https://www.michigan.gov/mgcb/0,4620,7-351-97573_99843-538743--,00.html).

### **Live Game Consumables**

Consumables, such as cards and dice, used by live game service providers shall meet minimum standards, specifications, and requirements prescribed the board. General requirements for live game consumables include, but are not limited, to all of the following:

- a) Procedures shall be implemented for tracking the inventory of consumables from receipt, through storage, installation, use, retirement, and destruction. All consumables shall have an associated audit trail showing which designated staff had access to the consumables at any given time for any given operation.
- b) Inspections shall be performed on consumables before being placed in operation. Periodic random inspections shall be performed on the consumables while in use, from disbursement to retirement.
- c) Used consumables shall be destroyed in a manner which prevents their accidental re-use in live games, and which puts them permanently beyond use. Consumables that are the subject of any investigation shall be retained until completion of the investigation.
- d) Procedures shall be in place to ensure consumables are stored in secure locations and are properly accounted for and controlled.

### **Playing Card Specifications**

All playing cards utilized by the live game service provider shall comply with all of the following specifications:

- a) Unless otherwise determined by the board, all decks of cards shall be one complete standard deck of 52 cards in four suits. The four suits shall be hearts, diamonds, clubs, and spades. Each suit shall consist of all of the following numerical cards:
  - i. Two to 10.
  - ii. A jack.
  - iii. A queen.
  - iv. A king.
  - v. An ace.
- b) The backs of each card in a deck shall be identical and no card shall contain any marking, symbol, or design that will enable a person to know the identity of any element printed on

- the face of the card or that will differentiate the back of that card from any other card in the deck.
- c) All edges shall be perfectly square with each side at a precise 90-degree angle to each adjacent side of the card.
  - d) The radius of all four corners shall be exactly the same.
  - e) Unless otherwise approved by the board, the decks of cards utilized by the live game service provider shall be unique to the conduct of live games in Michigan and distinct from other decks of cards utilized by the live game service provider in other jurisdictions.
  - f) If playing cards have a white border, then the border shall be a minimum of 3/16 of an inch on each side of the card.
  - g) In the hearts suit, the hearts shall be a burgundy red color.
  - h) In the diamonds suit, the diamond pips shall be a burgundy red color.
  - i) In the spades suit, the spades shall be a black color.
  - j) In the clubs suit, the trefoil-shaped figure shall be a black color.
  - k) All new card decks must arrive at the live game environment wrapped in cellophane, shrink wrap packaging, or with a tamper-resistant security seal.
  - l) The card supplier's identification name shall be placed on each box.

#### **Dice specifications**

Unless otherwise approved by the board, all dice utilized by a live game service provider shall comply with all of the following specifications:

- a) Each die shall be formed in the shape of a perfect cube and of a size no smaller than 0.750 inches on each side nor larger than 0.775 inches on each side.
- b) Unless otherwise approved by the board, the dice utilized by the live game service provider shall be unique to the conduct of live games in Michigan and distinct from other dice utilized by the live game service provider in other jurisdictions.
- c) Each die shall be transparent and made exclusively of cellulose, except for the following:
  - i. Spots.
  - ii. Name, trade name, or logo of the live game service provider.
  - iii. Serial number or letters, or both.
- d) The surface of each side of the die shall be perfectly flat and the spots contained in each side of the die shall be perfectly flush with the area surrounding the spots.
- e) The edges and corners of each die shall be perfectly square and form 90-degree angles with each adjacent side.
- f) The texture and finish of each side shall be exactly identical to the texture and finish of all other sides.
- g) The weight of each die shall be equally distributed throughout the cube, and no side of the cube may be heavier or lighter than any other side of the cube.
- h) Each die shall have six sides bearing white circular spots from one to six, respectively, with the diameter of each spot equal to the diameter of every other spot on the die.
- i) Each die shall have spots arranged so that all of the following provisions are satisfied:
  - i. The side containing one spot is directly opposite the side containing six spots.
  - ii. The side containing two spots is directly opposite the side containing five spots.
  - iii. The side containing three spots is directly opposite the side containing four spots.

- j) Each spot shall be placed on the die by drilling, or the equivalent, into the surface of the cube and filling the drilled out portion with a compound that is equal in weight to the weight of the cellulose drilled out and that forms a permanent bond with the cellulose cube.

### **Table Specifications**

Each table shall contain a symbol imprinted on it that clearly indicates that the live game service provider is offering the game for play in Michigan. This may include an object that depicts the shape of the State of Michigan with the letters "MI" in the middle of the object.

### **Other Consumable Specifications**

The board reserves the right to prescribe specifications for any other consumable that will be utilized to conduct live games.

### **Live Game Soft Launch Requirements**

Soft launch procedures will be conducted by the board to provide an opportunity for the live game service provider to demonstrate that live game staff are trained in the performance of their duties, systems perform as expected under the stress of live gaming, and operational and revenue reporting internal controls and procedures are effective. The board anticipates performing these procedures over the course of two days.

Prior to commencing soft launch, the live game service provider shall:

- a) Schedule a site inspection with the board to ensure adequate security and surveillance measures are in place.
- b) Provide a URL and access credentials for a production environment test account to include all live games offered in the live game environment.
- c) Schedule pre-launch testing with the board of all games to demonstrate performance of the games and that staff are adequately trained in the performance of their duties.
- d) Provide the board with a list of internet gaming platform providers that will offer live games as part of the soft launch. The board reserves the right to perform additional procedures for all platform providers that are not included in the initial soft launch process that elect to utilize the live game service provider.
- e) Provide the board with a list of live games to be offered during soft launch and the schedule for each game.
- f) Provide the board with a list of personnel responsible for overseeing the soft launch. The list must identify the name(s) of the person(s), contact information and area of responsibility.
- g) Provide read-only remote access to the internet gaming platform(s) and live game system for designated board personnel.
- h) Provide the board with sample win/loss reports by gaming date and month.
- i) Provide the board with a list of games, software, hardware, equipment, and consumables to be utilized to conduct live games.
- J) Provide the board with all manuals and additional documents for live game equipment and other devices used to conduct live games.
- k) Schedule an inspection of any remote game server hardware not located in the live game environment.

- l) Obtain written approval from the board to commence soft launch.

During soft launch, the live game service provider shall:

- a) Offer each live game type for play for a minimum of three hours each day.
- b) Demonstrate opening, closing, card shuffling, and consumable change procedures for each live game offered for play during soft launch.
- c) Demonstrate resolution of anomalous events and dealer mistakes in accordance with approved internal controls and procedures.
- d) Demonstrate acceptable minimum latency between the audio/video signal of each live game and the user interface to ensure the performance and integrity of games.
- e) Demonstrate that all live game activity is properly recorded by simulcast control servers.
- f) Demonstrate performance of the tipping functionality with the internet gaming platforms, if applicable.
- g) Demonstrate performance of barcoded card counting/reading machines and dice readers by conducting tests under board observation.
- h) Demonstrate performance of roulette wheels and balls by conducting tests under board observation.
- i) Demonstrate performance of dice shakers/throwers by conducting tests under board observation.
- j) Demonstrate that cards, dice, and other consumables meet specifications established by the board by conducting tests under board observation.
- k) Demonstrate that the internet gaming platform(s) and live game system properly prevent past posting.
- l) Demonstrate knowledge, skills and abilities of staff assigned to monitor live game play from a central control room.
- m) Submit a sample software release note to the board to include all required information.

The board will have staff onsite who will work with live game service provider personnel to ensure full compliance with the board's regulatory requirements. The live game service provider must notify the board of any anomalies, malfunctions, and/or violations of Act, rule, and this guidance document that occur during soft launch by submitting an incident report to the board.

The board intends to monitor key performance data during soft launch. The live game service provider must provide the board with daily key performance data, including, but limited to, the following:

- a) Number of unique patrons who accessed the live games from each website or platform provider and in total.
- b) Total handle and win/loss for each game broken down by website or platform provider.
- c) Number of hands/rounds played on each game broken down by website or platform provider.
- d) A list of any patron complaints received by the live game service provider or a participating operator or platform provider related to the soft launch.

The board will authorize the full use of the live game system when the board is satisfied that the live game system and its interactions with internet gaming platforms is working as intended.

### **Board Access to Production Environment and Physical Location**

The live game service provider shall provide the board with continual and unrestricted access to the live gaming production environment, physical location, and live game equipment and consumables for any reason the board determines necessary to regulate, license, enforce, and audit the conduct of live games. This shall include, but is not limited to, access to all live audio/video feeds required or otherwise implemented under the Live Game Environment Security, Surveillance and Recording, and Simulcast Control Servers sections of this document, including all entry and exit points.

### **Live Game Internal Controls and Procedures**

Each operator and platform provider that intends to conduct live games shall amend their internal controls to address such games. Live game service providers may develop a uniform set of internal controls and procedures that all relevant operators and platform providers may adopt and implement as an appendix to their internal controls to satisfy this requirement. The internal controls and procedures shall ensure all of the following, without limitation:

- a) All live game security issues, significant system failures, and incidents are swiftly responded to and reported to the board.
- b) Any person is prevented from tampering with or interfering with the operation of any live game or live game equipment.
- c) All live games have been approved by the board prior to being distributed to any operator or platform provider.
- d) Staff of the live game service provider, including game attendants:
  - i. Undergo periodic background checks.
  - ii. Attend and receive adequate training to provide live games in a fair and honest manner according to documented procedures and game rules. Evidence of initial training and periodic refresher training shall be maintained.
  - iii. Receive training and reminders of any physical behavior which is prohibited or mandated. The training received shall be reinforced by supervisory staff.
- e) Shift rotations, shift patterns and staff allocation are documented, including how game attendants are allocated to tables/games (i.e., without prior knowledge of which tables/games they will be serving and with their time-on-game set at a level to deter harmful relationships being developed) and changes in game attendants during exceptional circumstances.
- f) Patrons who reject tables/games and re-apply for another within the same game type on a consistent basis until they arrive at their preferred table/game are reasonably detected and prevented from wagering.
- g) Records are maintained which allow staff records to be audited and investigated if staff members are directly involved in a chain of events or if their presence in a particular place and/or at a particular time is crucial to understanding a chain of events.
- h) The hiring and termination of staff follow defined processes and are properly documented.
- i) Supervisory employees are always present when live games are taking place.
- j) Staffing logs are maintained for each table/game.
- k) Anomalous events which may occur during live games are documented and understood by staff, including, but not limited to, all of the following:

- i. Specialized device or physical randomness device malfunctions, including incorrect outcome detection.
  - ii. Dropped cards.
  - iii. Misdeals.
  - iv. Re-spins.
  - v. Aborted games.
  - vi. Table/game closures.
- l) Consistent card shuffling procedures are in place, including a verification of the card count, frequency of shuffling, and cases for reshuffling. The shuffling of cards shall be logged.
- m) A single member of staff would not be able to undertake all duties concerning game management and there is adequate segregation of responsibilities prior to play, during play and after play.
- n) Defined procedures are in place to address patron disconnection or any video, voice, or data stream disruptions during a live game and those procedures are readily accessible and clearly communicated to all patrons.
- o) Wagers placed on live games follow defined procedures, including, but not limited to, all of the following:
  - i. When wagers are placed by verbal instruction, the content of the wager is communicated back and acknowledged by the patron before the wager is confirmed.
  - ii. When a game attendant is receiving wagers indicated by the patron, a clear indication or notification if the wager has been accepted or rejected (in full or in part) is provided to the patron.
  - iii. The winning patron is notified of their win, including the amount won, after the completion of the game and their account balance is updated either immediately or once they exit the game.
- p) Variations in the operation of card shufflers and shoes, roulette wheels, dice shakers/throwers or other live game equipment are incorporated into the game procedures to maintain randomness. This equipment shall have a level of randomness consistent with strict regulation provided in land-based casinos to ensure their fairness and integrity.
- q) Card shoes and similar specialized devices and physical randomness devices are tamper-proof once they have been loaded to preclude interference prior to and during play.
- r) Any specialized devices and physical randomness devices are periodically inspected and tested for reliability and integrity. Logs and records shall be maintained of all inspections.
- s) Patrons are informed when the manual operation mode of a specialized device is activated. Any use of the manual operation mode must be tracked for further review.
- t) Specialized devices and physical randomness devices which show an unacceptable level of errors are identified and replaced.
- u) Game logs and records which collate game events into statistics are generated, reviewed, and analyzed for trends, irregularities, and errors relating to all of the following:
  - i. Game performance.
  - ii. Staff and/or locations in the live game environment, including supervisors.
  - iii. Shifts.
  - iv. Procedure violations.

- v. Other incidents.
  - v) Live gaming is monitored to ensure that all games are being conducted in accordance with internal controls and procedures and in a fair and honest manner.
  - w) Live gaming and all live game transactions are properly accounted for and recorded.
  - x) Patron/dealer collusion is detected and prevented.
  - y) Change control processes, which include related release note reporting format and processes, are adopted, implemented, and maintained in a manner approved by the board.
  - z) Live game equipment and consumables are inspected before being placed in operation with periodic random inspections performed thereafter.
    - aa) Past posting of wagers is prevented.
    - bb) Tips, if allowed by the platform provider or the live game service provider, are properly processed and accounted for. Tipping procedures shall adequately mitigate the risk of patron/dealer collusion, which shall include, but is not limited to, the pooling of all tips received.

### **Rules of Live Games**

The rules of each live game shall be submitted to the board for review and approval. Unless otherwise approved by the board, the rules of games shall be consistent with those offered for play in land-based casinos (if applicable).

### **Authorized Games**

The live game service provider may only conduct live dealer games that are authorized under LIGA and the related rules and approved by the board.

### **Licensing**

The board will review the listing provided by the live game service provider of all live game equipment and consumable items that will be utilized in the conduct of live games, which includes the supplier or vendor for each item, to determine which entities require an internet gaming supplier license or vendor registration. The following are generally considered internet gaming suppliers related to the conduct of live games:

- a) Live game service providers.
- b) Live game equipment and game suppliers.
- c) Card, dice, and other consumable suppliers.
- d) Suppliers of card shufflers and shoes, automated card readers, and automated dice shakers/throwers.
- e) Roulette wheel suppliers (both automated and non-automated).

Most states generally leverage their existing gaming acts and rules and, therefore, may not require a separate license for most of these suppliers to conduct internet live games. However, since LIGA is a separate and distinct act, an internet gaming supplier will be required to obtain a separate internet gaming supplier license even if it currently holds a license under the Michigan Gaming Control and Revenue Act.

It is anticipated that functions such as payment processing, know your customer, geolocation and patron account management will be performed by the internet gaming platform and, therefore, separate consideration of these types of suppliers/vendors should not be required.

Vendors that provide colocation services that host live game servers and equipment must obtain a vendor registration from the board.

The live game service provider shall provide an organizational chart of personnel with responsibility over the conduct of live games for the board to determine which positions will require an occupational license. Occupational licenses are generally required for dealers, security and surveillance personnel, and live game supervisors and management personnel. Live game service provider executive and key personnel may also require occupational licenses.