



## **STANDARDS ON PULL-TABS**

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## **PULL-TAB RECORD KEEPING AND REPORTING STANDARDS**

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**PULL-TAB RECORD KEEPING AND REPORTING STANDARDS**

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Purpose: Publication of these recommended standards should not be construed as an endorsement of this form of legalized gaming. **These standards are intended to provide regulatory guidance** to jurisdictions that are contemplating or have enacted legislation, which permits the legal use of pull-tabs.

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## GENERAL STANDARDS:

These standards are intended to apply to the type of gaming product commonly known as pull-tabs. Pull-tabs are referred to in various jurisdictions as charitable gaming tickets, break opens, banded tickets, jar tickets, tip tickets, pickle cards, Lucky Seven cards, Nevada Club tickets, instant bingo tickets and other such names. Pull-tabs include tickets used with tip boards, seal cards, and event games. No pull-tab ticket prize should be considered a part of the total prizes permitted for a bingo session.

These standards are NOT intended to apply to non-repeating numerical games where a winner has not been predetermined by the manufacturer. In addition, every standard is not appropriately applied to all types of pull-tab games. In the event a standard is not appropriate to a particular type of pull-tab game, every effort will be made to state that a standard does not apply.

When it is necessary to differentiate between types of pull-tabs, the term “break open” will be used to refer to a game piece that is made of cardboard and has one or more perforated window tabs behind which are winning and losing numbers or symbols that must be revealed by tearing off a covering tab.

## DEFINITIONS:

*The terms used here are an effort to standardize language for all jurisdictions. In the past, the term "charitable gaming tickets" was utilized. However, many jurisdictions have now legalized pull-tabs for commercial or private enterprise. Thus, the committee proposes these new terms.*

**“Banded ticket.”** Banded ticket means those games in which the game piece is made of paper and in which the winning or losing symbols are covered by folding that paper and then banding the folds with a separate piece of paper. Banded tickets may be stapled into small booklets of two or more tickets.

**"Deal."** Deal means each separate game or series of pull-tab tickets with a specific form number and a unique serial number.

**“Event game.”** Event game means a type of pull-tab game, played with or without a seal card, in which certain prizes are determined by the draw of a bingo ball or by some other approved specified event. The approved specified event must consist of a method of randomly selecting numbers or symbols that correspond to the numbers or symbols printed by the manufacturer on the pull-tab.

**"Extended Payout Structure."** Extended payout structure means the payout structure plus the number of winning tickets at each prize level in a pull-tab game (includes combination winners at two or more prize levels).

**“Flare.”** Flare means the board or placard that accompanies each deal of pull-tabs and that has printed on or affixed to it the following information:

1. The game name.
2. The manufacturer’s name or distinctive logo.
3. The form number.
4. The ticket count.
5. The prize structure, including the number of symbols or number combinations for winning pull-tabs by denomination, with their respective winning symbols or number combinations.
6. The cost per play.
7. The game serial number.

**“Form Number.”** Form number means the unique number or alphanumeric code that identifies the cost per play, ticket count, payout structure, and extended payout structure (if any).

**“Last Sale Game.”** Last sale game means those pull-tab games where an automatic instant prize or a chance at a seal prize is offered for the purchaser of the last remaining ticket in the deal.

**“Manufacturer.”** Manufacturer means a person who prints, cuts, folds and/or bands, laminates, packs, or otherwise fabricates or assembles from raw materials and subparts a pull-tab or deal of pull-tabs.

**“Non-repeating Numerical Game.”** Non-repeating numerical game means a game played with banded tickets. They differ from other banded tickets and pull-tabs in that the winner is not predetermined by the manufacturer. Winners are determined by either the distributor/supplier or the end user. **Note:** NAGRA discourages the use of non-repeating numerical games because of the lack of security and the possibility of insider information.

**“Payout Structure.”** Payout structure means the total ticket count, the number of winning combinations at each prize level, the collective value of all prizes to be awarded, and the profit built in to the game by the manufacturer.

**“Person.”** Person means an individual, firm, association, corporation, or other legal entity.

**“Progressive or Carryover game.”** A progressive or carryover game means a pull-tab game, played with seal card(s), that is designed by the manufacturer to include a jackpot prize that is carried over to a subsequent deal of the same form number in the event the jackpot prize is not won.

**“Pull-tab.”** Pull-tab means the gaming pieces used in a game of chance, which are made completely of paper or paper products with concealed numbers or symbols that must be exposed by the player to determine wins or losses.

**“Seal Card.”** Seal card means a board or placard used in conjunction with a deal of pull-tabs that contains a seal or seals which, when removed or opened, reveal pre-designated winning numbers, letters or symbols. The seal card may serve as the game flare if it meets all the requirements of a flare.

**“Serial Number.”** Serial number means the unique identification assigned by the manufacturer identifying a specific deal of pull-tabs. A serial number may be numeric, alpha, or a combination of numeric and alpha characters.

**“Winner Protection.”** Winner protection means a unique symbol or printed security device, such as a line through the winning combination(s), specific number keyed to a particular winning pull-tab, or the name of the symbol or some of the symbol colors changed for a winning pull-tab, or other similar protections placed in the winning window(s) of prize winning pull-tabs.

#### **OPACITY:**

The darkness and weight of ticket stock must protect the concealed numbers, symbols, or winner protection features from being viewed or determined from the outside of the pull-tab, including but not limited to, by using a high intensity lamp.

#### **RANDOMIZATION:**

Winning pull-tabs must be distributed and mixed among all other pull-tabs in a deal so as to eliminate any pattern between deals, or portions of deals, from which the location or approximate location of any winning pull-tab may be determined. The pull-tab deal must be assembled so that no placement of winning or losing pull-tabs exists that allows the possibility of prize manipulation or "pick out." Banded tickets packaged in bags, rather than boxes, are also subject to these requirements.

Testing procedures must be utilized to validate the randomness of the pull-tab products. Such testing must be designed to ensure randomness of the winning tickets within a deal, or portions of deals, as well as, as well as randomness (independence) of winning positions across units of tickets.

#### **MINIMUM INFORMATION:**

- A. The minimum information printed on an unopened pull-tab with an overall area of 2.5 square inches or more must be:
  1. Name of manufacturer or its distinctive logo.
  2. Name of game.

3. Manufacturer's form number.
4. Price per individual pull-tab.
5. Minimum five-character game serial number that is unique to that deal.
6. Number of winners, and respective winning number(s) or symbol(s), and prize amounts, or a flare must be included giving that information.

**Note:** Items 1, 3, and 5 must remain when all window tabs have been removed from the ticket.

B. A pull-tab with an overall area of at least 1.6 square inches unopened but less than 2.5 square inches unopened is not required to contain the information in item 6 if that information is contained in a flare card that accompanies the deal.

**Note:** Items 1, 3, and 5 must remain when all windows tabs have been removed from the ticket.

C. A pull-tab with an overall area of less than 1.6 square inches unopened is not required to contain the information in items 3, 4, and 6 if that information is contained in a flare card that accompanies the deal.

## **GAME CONSTRUCTION:**

### **General Standard**

The game must be designed, printed, glued, cut and assembled in such a manner as to prevent determination of a winning or losing ticket without removing the tabs or otherwise uncovering the symbols or numbers as intended.

### **Printing**

- A. Each pull-tab in a deal must bear the same serial number. There must not be more than one serial number in each deal. No serial number used on a deal of pull-tabs may be repeated on that same manufacturer's form number within a three-year period.
- B. The number(s) or symbol(s) must be fully visible in the window and must be placed so that no part of a symbol or number remains covered when a tab is removed. Displacement of the symbols to the left or right in a window is allowed for increased game security.
- C. It must not be possible to detect or pick out winning pull-tabs from losing tickets through variations in printing graphics or colors, especially those involving different printing plates.



- D. All winning pull-tabs must have at least one winner protection feature. All winning pull-tabs that entitle a player to an instant prize greater than twenty (\$20) dollars must include an additional form of winner protection.

### **Laminating**

All break-opens must be glued on all edges and around each window. The glue must be of sufficient strength and type so as to prevent the undetectable separation or delamination of the break-open. For banded tickets, the glue must be of sufficient strength and quality to prevent the separation of the band from the ticket.

### **Cutting**

The window slits on each break-open must be perforated on at least three cut sides. The ties must be of a thickness or strength to prevent “peeking” under the windows and if “peeking” has occurred it must be readily detectable.

It must not be possible to isolate winning or potential winning pull-tabs from variations in the size or the appearance of a cut edge of the pull-tabs comprising a particular game.

## **PACKAGING**

- A. Each deal's package, box, or other container must be sealed or taped at the manufacturer's factory with a tamper resistant seal or tape, which includes a warning message to the purchaser that the deal may have been tampered with if the package, box, or other container was received by the purchaser with the seal or tape broken. The seal or tape must be visible from outside the package, box, or container and must be of such construction as to guarantee that should the container be opened or otherwise tampered with, evidence of the opening or tampering would be easily detected.
- B. Deals packaged exclusively in bags that are heat-sealed by the manufacturer satisfy the requirements of Section A provided, (1) the heat-sealed bags have the warning message imprinted directly on the bags; or (2) the manufacturer affixes a warning message to the bags.
- C. The deal's serial number shall be clearly and legibly placed on the outside of the deal's package, box, or other container or be able to be viewed from the outside of the package, box, or other container.
- D. For deals shipped to any state that requires a state identification or similar stamp to be placed on the flare by a manufacturer/distributor, the flare for the deal shall be located on the outside of each deal's sealed package, box, or other container so that the secured container need not be opened to place the stamp.
- E. The manufacturers must include with each package, box or container of pull-tabs, in bold

print of sufficient size to be easily read, a message that states substantially the following: "Pull-tabs must be removed from this packaging container and thoroughly mixed prior to sale to the public." The message may be printed directly on the package, box or container, affixed to the package, box or container, or inserted in a heat sealed bag, provided the message is visible from outside the package, box or container.

- F. The manufacturer must affix a bar code label that contains at a minimum the name of the manufacturer or its distinctive logo, the game form number and the game serial number to package, box or container of a deal of pull tabs. This bar code must be visible from outside the package, box or

### **DEFECT CLASSIFICATION SYSTEM:**

Each jurisdiction should establish guidelines, procedures, rules, or legislation to address possible defects in construction and packaging for pull-tabs sold within their jurisdiction. There are four basic levels:

1. Pull-tabs with defects that do not affect game security or playability. Examples are printing out of register, uniform bad color, and poor appearance.
2. Pull-tabs with defects that may affect game security but are limited to a specific number of deals of a particular form number or the defect is not easily detectable by a gaming entity and/or members of the general public.
3. Pull-tabs whose defects affect game security, are limited to a particular form number, and are detectable by a gaming entity and/or the general public.
4. Pull-tabs whose defects threaten game security and public confidence in the game are easily discernible by a gaming entity and/or members of the general public and are capable of being used to adversely affect the fair play of the game. .

### **TRACKING:**

Every manufacturer of pull-tabs must be able to track each deal of pull-tabs from the manufacturer to the next point of sale and must retain that information for at least 42 months.

### **SPECIFIC STANDARDS**

These standards are intended to apply to seal cards, progressive or carryover games and event games. Unless otherwise provided, the general standards applicable to pull-tab tickets or games are also intended to apply.

### **A. Seal Cards**

1. The seal card may serve as the game flare so long as it meets all the requirements for a flare.
2. The seal card must contain the game's form number as well as the serial number.
3. The seal may be sewn, covered in latex or other opaque material, or covered by a die-cut tab. If a die-cut tab is used, the ties must be of a thickness or strength to prevent "peeking" under the windows and if "peeking" has occurred it must be readily detectable.

### **B. Progressive or Carryover Games**

1. The amount dedicated to the progressive jackpot must be predetermined by the manufacturer and built into the payout structure for the game. The dedicated amount must be printed by the manufacturer on either the flare for each game or on each ticket in each game.
2. All games contributing to the progressive jackpot must be of the same form number.
3. The flare for the progressive jackpot must contain an area where the current amount of the progressive jackpot can be posted.
4. The serial numbers for each deal contributing to a progressive jackpot must be recorded and maintained by the operator.
5. If a progressive or carryover game uses a jackpot card that is separate from the jackpot seal, the jackpot card must contain space for the operator to record the serial numbers for all games contributing to the jackpot.

### **C. Event Games**

1. No event pull-tab may be both an instant winner and a hold card.
2. No game may contain duplicate hold combinations. If a game contains multiple sets of hold combinations, each set must be distinguishable by color or distinguishing features.
3. An event pull-tab ticket may contain more than one hold combination.
4. The number of winners and the prize amount must be built into the payout structure for the game by the manufacturer.
5. No event pull-tab ticket prize may exceed the individual ticket prize limit for pull-tab games.

6. No event ticket prize should be considered a part of the total prizes permitted for a bingo session.

## **RULES OF PLAY**

1. The flare accompanying the deal containing all required game information must be posted in the vicinity of the deal and in view of the players while the deal is in play. Seal cards must be posted until all seal prizes are won, including the jackpot prize in a progressive or carryover game.
2. Pull-tabs may not be sold to the public from the original packing box or container.
3. Pull-tabs must be randomly packed or thoroughly mixed prior to being offered for sale to the public.
4. All winning pull-tabs must have the winning symbol/number defaced or punched immediately after redemption.
5. All winning and unsold pull-tabs must be kept for a time sufficient to allow auditing by the regulators, at a time to be determined by each regulating body.
6. All used pull-tabs must be properly treated, i.e., by burning, shredding, immersing in water, or in some other manner that prevents anyone from obtaining the used, defaced, or unsold pull-tabs and attempting to reuse that pull-tab or any portion thereof.
7. Because a limited number of people possess information about the financial status of the deal in play, and because those people may violate the integrity of the deal, the general public may be placed at an unfair disadvantage. Gaming licensees must apply strong management practices to educate and monitor their employees to make that information secure and take immediate and strong action to penalize employees for the distribution of that information.
8. Criteria on when and if games may be closed out or pulled prior to the sale of the last pull-tabs must be established. The rules need to define key terms and set conditions that must be met before games may be closed out.
9. All employees of a gaming licensee or persons assisting the gaming licensee in the sale of pull-tabs must be prohibited from buying or playing pull-tabs at their place of employment.
10. It must be required that the gaming licensee verify the form number, serial number, and winner protection for all winning pull-tabs redeemed and prizes paid.
11. It must be required that the gaming licensee verify the identity of the individual redeeming winning pull-tabs with a prize of over \$50. It is further recommended that the identity of an individual redeeming a winning pull-tab with a prize of \$50 or more be recorded and that record attached to the pull-tab, and if applicable, the seal card or progressive card, and kept with the records of that game.
12. It is recommended that all gaming licensees, managers, and other "significant personnel" be

licensed by regulators and that such licenses must be issued only after a background investigation and adequate training.

13. It cannot be emphasized strongly enough that the proper regulation of gaming requires that adequate enforcement levels and funding be provided from the inception of the gaming activity.
14. In addition to the above rules, jurisdictions should also consider other potential rules of play, including:
  - a. Whether to allow, require, or prohibit commingled or continuous game play.
  - b. Whether to establish a time limit within which winning pull-tabs must be redeemed. Some jurisdictions require redemption within 15 minutes.
  - c. Whether to permit pull-tabs to be removed from the site prior to redemption and to define what constitutes the gaming site.
  - d. Whether to allow players to play on credit or to prohibit credit play.
  - e. How defective games are to be handled at the gaming licensee level.
  - f. How counterfeit pull-tab tickets are to be handled at the gaming licensee level.
15. If sample or promotional pull-tabs are allowed, then the following provisions and restrictions should be placed upon them:
  - a. No sample pull-tab ticket should contain any high tier winners. Only the bottom tier winners or non-winning pull-tabs should be allowed to be sample pull-tabs.
  - b. All sample pull-tabs must be marked/stamped by the manufacturer as "sample," "void," or "for promotion only."

**NORTH AMERICAN GAMING REGULATORS ASSOCIATION**

**PULL-TAB RECORD KEEPING AND REPORTING STANDARDS**

## **PULL-TAB RECORD KEEPING AND REPORTING STANDARDS**

### **MANUFACTURER RECORD KEEPING AND REPORTING:**

To adequately control pull-tabs within the regulatory jurisdiction, all manufacturers of pull-tabs who sell, deliver, supply, or market product in the jurisdiction must obtain a license. The licensing requirement should apply to any person who prints, cuts, folds and/or bands, laminates, packs or otherwise fabricates or assembles from raw materials or subparts a pull-tab or a deal of pull-tabs either directly or pursuant to a contract or agreement with another.

The manufacturer must develop internal control procedures which enable them to track pull-tab deals by form and serial number. At a minimum the deals sold should be reported by form number and serial number. The regulatory agency must require reporting at specific intervals.

The regulatory agency may require the manufacturer to obtain prior written approval before marketing product in their jurisdiction.

### **DISTRIBUTOR RECORD KEEPING AND REPORTING:**

Any distributor who sells, delivers, supplies or markets pull-tab products must obtain a license. The distributor must develop a procedure to track the pull-tab deals sold to their customers and account for all pull-tab deals purchased, sold, and in inventory. The distributor must explain any discrepancy of deals not accounted for.

Reporting required by the distributor must include, at a minimum, monthly reporting of:

1. Date of sale.
2. Serial number of the deals.
3. Description (name of the game).
4. Form number of the deals.
5. Ticket count.
6. Name and address of purchaser.
7. License number of purchaser.
8. Name of manufacturer.



## **ORGANIZATION RECORD KEEPING AND REPORTING:**

### **PULL-TAB CONTROL PROCEDURES**

The organization must control the access and distribution of all pull-tabs.

1. Designate an individual (Pull-Tab Manager) who will control, purchase, track, and account for the pull-tabs.
2. Develop procedures to track the purchase, storage, distribution and removal from inventory of each pull-tab deal.
3. Develop procedures to account for the pull-tabs sold by individual pull-tab sellers. The manager should check out a designated number of pull-tabs to the individual pull-tab seller. The manager and the pull-tab seller must both cash in and account for all pull-tabs and cash issues to the pull-tab seller at the conclusion of the individual's sale period.
4. The manager must ensure that all funds are deposited into a financial institution within the State in an account specifically designated as the pull-tab bank account.
5. Disbursements pertaining to all pull-tab activity, such as purchases of the pull-tabs and payment of expenses, are required to be paid from the pull-tab bank account.
6. Ensure that all expenses are paid by check, or electronic transfer, from the pull-tab bank account. The regulatory agency may authorize other forms of payment such as money orders or certified check but must require that an adequate paper trail exists for these transactions.
7. The organization must reconcile the funds deposited into the pull-tab bank account to the funds generated from the sale of pull-tabs (the ideal profit of the pull-tabs purchased adjusted by the ideal profit of the beginning and ending inventory of the pull-tabs). This procedure must be performed by an individual who is independent of the person primarily responsible for the control and handling of the inventory and purchasing of the pull-tabs or responsible for accounting for the funds generated from the sale of pull-tabs.

## **PULL-TAB INTERNAL CONTROL DOCUMENTS**

Records must contain information which allows the governing regulatory agency and the organization the ability to track pull-tabs from the date of purchase through their final disposition. The organization or regulating agency must develop the following forms to accomplish this.

1. The purchase register at a minimum should include the description, form number, date of purchase, cost, and purchase invoice number of the pull-tab deal.
2. Inventory control records including the description of the pull-tab, form number, pull-tab manufacturer, date the pull-tab deal was placed in and withdrawn from inventory, individual withdrawing the pull-tab deal from inventory, and management approval to withdraw the pull-tab deal.
3. The sales register at a minimum should include the pull-tabs sold by individual workers at a bingo game or similar club function, the individual's name, value of the pull-tabs issued, value of pull-tabs cashed by the individual, amount of cash turned in by the individual, signature block for the manager and individual selling the pull-tabs.
4. A register which records the description of the pull-tab deal, the date the deal was placed into play, the serial number of the deal, and the date the deal was taken out of play or play was completed.
5. Daily cash count records should include the amount of cash available for deposit and the amount actually deposited in the pull-tab bank account. The deposit slip or other record should reflect the serial number of the deals sold.
6. Check register would include a detail of the deposits and disbursements from the pull-tab bank account.

## **PULL-TAB REPORTS**

Reporting frequency to the governing regulatory agency should provide the organization and the agency information for proper control of the pull-tab activity. The reports filed by the organization should include:

1. Gross proceeds, prizes and definite profit of the deal.
2. Actual profit realized for pull-tab deals sold.
3. Expenses paid.
4. Lawful use of funds not classified as expenses.
5. Inventory of deals on hand including the serial number, description, form number, and method used to inventory open deals.
6. Pull-tab bank account information. The regulating agency may require the organization to compare the amounts deposited to the pull-tab bank account to the ideal profit and explain any variances.

## **DISPOSITION OF FUNDS**

Reporting the disposition of funds for purposes as set out in the governing jurisdiction statutes and administrative rules should include a complete description of how the funds were used, what charity received the funds, and the responsible party within the charity, which accepted the funds. If funds are transferred out of the pull-tab bank account into a different bank account of the organization or other related organizations, the disbursements from the bank account that received funds generated from the sale of pull-tabs must be examined. No funds shall be expended from the pull-tab bank account unless the funds satisfy lawful purpose use as determined by statutes or rules of the jurisdiction.