

COUNTY/CITY LOTTERY COMPLIANCE PROCEDURES REPORT

SCOTTSBLUFF COUNTY

**07/01/24
THROUGH 06/30/25**

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Issued by Scotts Bluff County.**

DATE OF ISSUANCE 9/30/2025

**Lisa Rien
Management Accountant**

BACKGROUND INFORMATION

Title 316, Chapter 35, Section 616 of the Nebraska Administration Code requires a county, city, or village to perform, on an annual basis coinciding with the fiscal year of the county, city, or village, compliance procedure of its keno lottery prescribed by the Nebraska Department of Revenue. The compliance procedures are set forth in Revenue Ruling 35-2006-04 issue by the Department on January 3, 2006.

Section 616 further requires a report outlining the findings from the performance of the compliance procedures to be submitted by the county, city, or village to the Department within 90 days of the end of the fiscal year of the county, city, or village. In the event a county, city, or village cancels its license or allows such license to expire prior to the end of the reporting period, a final report shall be filed with the Department within 90 days of the date the license was canceled or expired.

This report is intended solely for the information and use of the Nebraska Department of Revenue and the Scotts Bluff County. However, this report is a matter of public record, and its distribution is not limited.

Background: Scotts Bluff County 2024-2025 Keno operations consist of live-ball Keno, random number generator and AKVS (Automatic Keno Verification System) Keno. Live-ball Keno is the primary game played at Scotts Bluff County sites. The Scotts Bluff County Keno Operator is Small Business Solutions, LLC, owner Ryan Keller.

COMPLIANCE PROCEDURES AND FINDINGS

#1 & #2 COMPLIANCE REQUIREMENT (MANUAL BALL DRAW METHOD): An unannounced observation of the keno activity shall be made at least annually for all Sponsors who utilize a manual ball draw method for selection of winning numbers during the conduct of a keno lottery.

FINDINGS: An unannounced observation of the number selection process was performed for the following games:

I performed this activity on April 17, 2025.

During an unannounced observation, the following licensed lottery workers were present and participated in the winning number selection process – Michelle Duyck, Courtney Macias, Bryanna Sherard and Tricia Brooks.

1. The number of the game being drawn was recorded on a blank keno draw ticket.
2. Lottery worker called the ball numbers as they were selected and entered the number into the keno system.
3. A different lottery worker (marker) recorded the ball numbers on the draw ticket.
4. The keno manager verified the number drawn by visually comparing the ball number in the rabbit ears to the number entered into the keno system prior to computing the game.
5. The keno manager signed the draw ticket as the evidence of his or her review.
6. The method of winning number selection used at the time of the unannounced observation agreed with the designated method on file with the Department.

EXCEPTIONS/COMMENTS:

I also visited the Main Keno Parlor at other times during the year and observed games on 11/19/2024, , 2/20/2025, 4/17/2025, 6/11/2025 at which times there were always a minimum of 3 people. All games had a regular amount of time between games.

#3 COMPLIANCE REQUIREMENT (AUTOMATED BALL DRAW METHOD): Verify that keno management personnel have performed on a next day basis a review of all “no read” and duplicate number occurrences. Sponsors must also verify that keno management personnel of the Lottery Operator or Sales Outlet Location have performed on the next day basis a review of the game draw for a minimum of ten percent of the games run for the previous day. A written log of such reviews must be maintained by the Lottery Operator or Sales Outlet Location where the automated ball draw equipment is in use.

FINDINGS:

Scotts Bluff County Keno does not have an Automated Ball Draw system only a manual draw. This procedure is not applicable to us.

#4 COMPLIANCE REQUIREMENT (MANUAL AND AUTOMATED BALL DRAW METHODS):

View the video tape or digital recording for a minimum of five games for each month (from at least two different weeks within each month) to determine that the following items are in compliance with the regulations:

- a. The digital recording must have a clear image to show the empty rabbit ears or wheel, date and time, and full rabbit ears or wheel. The digital recording must also show the game number or the time and date which will relate to the game number.
- b. The winning numbers drawn per the digital recording must agree with the manual ball draw ticket prepared by a lottery worker prepared by a lottery worker, and the winning numbers recorded on the transaction log. Verify that all discrepancies were reported to the Nebraska Operator Sales Outlet Location, or Sponsor. Report all discrepancies not previously reported directly to the Nebraska Department of Revenue Charitable Gaming Division. Compare the time of the digital recording to the transaction log; also examine any procedure which would allow the Lottery Operator or Sales Outlet Location the opportunity to affect the outcome of the keno game.
- c. The digital recordings must be retained and may not be reused until the Sponsor has performed the compliance procedures on the recordings before releasing the recordings.

FINDINGS: The digital disc for the following dates and game numbers were reviewed:

March 20, 2025 Visit:

1/4/2025 – Game 970
1/17/2025 – 787
1/25/2025 – 996
1/27/2025 – 286
1/31/2025 – 868
1/31/2025 – 816, 817

April 17, 2025 Visit:

3/2/2025 - 177
3/7/2025 - 902
3/9/2025 - 142
3/19/2025 - 610
3/20/2025 - 816
3/25/2025 - 541, 542
2/7/2025 - 885
2/7/2025 - 893
2/7/2025 - 938
2/10/2025 - 347
2/12/2025 - 581
2/14/2025 - 897
2/17/2025 - 9
2/21/2025 - 937

June 11, 2025 Visit:

4/2/2025 - 772
4/20/2025 - 575
5/23/2025 - 400

1. The digital recording that I reviewed had a clear image to show the empty rabbit ears, date and time, and full rabbit ears. The recording showed the game number and the time and date which related to the game number.
2. The winning numbers drawn per the digital disc reviewed agreed with the draw tickets prepared by a lottery worker, and the winning numbers recorded on the transaction log.
3. There were no ball draw irregularities identified which were not previously reported to the Department for these months of the audit.

EXCEPTIONS/COMMENTS:

DVDs have been replaced with a cloud-based data system for reviewing keno activity. The quality is much better. New cameras were added as well.

#5 COMPLIANCE REQUIREMENT: Verify the accuracy of monthly game summary information provided by the Lottery Operator by tracing the gross proceeds and prize payouts from the keno systems transactions log to the monthly summary information.

FINDINGS: The gross proceeds and prize payouts from the monthly summary information provided by the Lottery Operator were compared to the totals recorded on the keno system

transaction logs. The monthly summary information agreed with the totals recorded on the keno System transaction logs.

EXCEPTIONS/COMMENTS:

The monthly summary reports are traced to the daily transactions logs. The monthly summary report is also traced to the Weekly Revenue Report and used in reconciliations for Procedure #6.

#6 COMPLIANCE REQUIREMENT: Determine that the gross proceeds of the keno lottery less prizes paid in cash are deposited into a separate bank account of the Sponsor or Lottery Operator. Monthly trace the deposits per the daily cash summary and the transaction log to the keno operations bank account to determine that the proper amount has been deposited within a commercially reasonable time frame and report any discrepancies.

FINDINGS: The gross proceeds of the keno lottery were deposited to the Operator's banks. The deposits per the daily cash summary and the transaction log were traced to the keno operations bank account by the Sponsor representative and the Keno Operator and no discrepancies were detected.

All deposits were made in a commercially reasonable time frame.

EXCEPTIONS/COMMENTS:

The Keno Contractor made all daily deposits and provided me with the reconciled monthly bank statements. I also reconcile Lucky Keno's bank accounts monthly for comparison and categorize the expense, transfers and deposits. The Contractor made the calculations and wrote a check to Scotts Bluff County, which was deposited into the Keno Fund-2850 (Community Betterment) monthly. I rechecked all his calculations while doing the monthly financial reports. All deposits appear to have been made in a timely manner.

The Keno Contractor paid the vendor the royalties and the Management Accountant calculated the royalty amounts owed to the Cities/Villages and State of Nebraska. As mentioned above the Contractor made the calculations and wrote a check to Scotts Bluff County that was deposited into the Keno Fund-2850 (Community Betterment). I rechecked all his calculations while doing the monthly financial reports.

Each month, the monthly summary report for each location is traced to the daily transaction log. The monthly summary reports are also tied to the "Weekly Revenue Report" for each location to ensure that the sales and payouts recorded in the spreadsheets are accurate. This gives assurance that the "Weekly Revenue Report" information is accurate, and that the reconciliation of the deposits is also correct.

The Keno Contractor has all the deposit accounts which cannot earn interest by law because the business is an LLC. The Reserve Fund is the only account that can and does draw interest. The interest is retained in the Reserve fund. These accounts are the main checking for all deposits; Prize Fund which handles all prize payouts; and Reserve Fund which handles all unclaimed wins.

#7 COMPLIANCE REQUIREMENT: Examine any cash overage or shortage in excess of \$25 per keno writer per shift/day and report unexplained and unresolved discrepancies and irregularities.

FINDINGS: There were no overages or shortage in excess of \$25 per keno writer per shift/day which were not previously reported to the Nebraska Department of Charitable Gaming.

EXCEPTIONS/COMMENTS:

I get a report each month outlining the overage/shortages at all the locations. This report outlines which location and how much. I am not aware of any overages/shortages that have not been reported to the Department.

#8 COMPLIANCE REQUIREMENT: The computer-generated prize tables(s) for all types of wagers must agree with the published prize pay table(s). Verify that the Lottery Operator has a procedure to maintain a log of all

updates and changes to the prize pay tables and that the active prize pay table(s) on the keno system agree with the published prize pay table(s).

FINDINGS: The active prize pay tables on all the keno systems were examined at the following locations Main Parlor, REDZ Bar & Grill, Morrill Tavern, and Back-a-Rack's and agreed with the published prize pay tables. The Lottery Operator maintains a log of all updates and changes to the prize pay tables and must inform the Scotts Bluff County Board of Commissioners before making any changes or updates.

EXCEPTIONS/COMMENTS:

Pay tables are also checked if a computer malfunctions or goes down due to hard drive failure.

#9 COMPLIANCE REQUIREMENT: Examine the financial security provided for prize payments to verify that the funds are guaranteed and in compliance with the regulations.

FINDINGS: I receive a verified copy from Platte Valley Bank located in Scottsbluff Nebraska of an irrevocable letter of credit for Small Computer Solutions, LLC in the amount of \$75,000.

EXCEPTIONS/COMMENTS:

#10 COMPLIANCE REQUIREMENT: Ensure that all lottery records are maintained as prescribed in Schedule 59-County/City Lottery Records approved by the Records Management Division of the Secretary of State's office and Regulation 35-622.

FINDINGS: Lottery records are maintained as prescribed in Schedule 59-County/City Lottery Records. Administrative records are kept at the County buildings. Actual keno tickets are no longer required to be held at the County location.

EXCEPTIONS/COMMENTS:

The records are stored in Management Accountant's locked storage room.

#11 COMPLIANCE REQUIREMENT: Sponsor must file a Nebraska County/City Lottery Report, Form 35K, for the annual period corresponding to the Sponsor's fiscal year. The report must be filed with the Charitable Gaming Division within 90 days of the end of the Sponsor's fiscal year.

FINDINGS: The Nebraska County/City Lottery Annual Report, Form 35K, covering the period 07/01/24 through 06/30/2025 was filed with Nebraska Department of Revenue-Charitable Gaming.

MISCELLANEOUS:

Additional procedures are completed as requested and approved by the Scotts Bluff County Board of Commissioners. These additional procedures are as follows: checking game time intervals, opening and closing times, W-2G s forms calculated and completed accurately, voided tickets are attached to transaction logs, outside and inside tickets are attached to transaction logs, major wins are calculated correctly and traced to transaction logs, audit all wins of \$1,500 and more and 5 – 6 smaller amounts randomly selected per location per month.

All Four locations are true Satellites of the Main. REDZ Bar & Grill Keno game was previously an independent random number generated by a computer on site, but this fiscal year changed to a true satellite location.

Respectfully submitted,

Lisa Rien
Management Accountant
Scotts Bluff County

Cc: County Commissioners

