



**STATE OF WASHINGTON  
GAMBLING COMMISSION**

*"Protect the Public by Ensuring that Gambling is Legal and Honest"*

Dear Electronic Raffle Applicant:

**RE: Preparation and Submission of Internal Controls**

Included in this packet is the internal control template describing the information you are required to submit to your local Special Agent regarding your planned electronic raffle activity.

The requested internal control information will describe your planned procedures and information for conducting electronic raffles. The table of contents outlines the information you need to include in your internal control document to cover administration, staffing, equipment, operation, security, and accounting procedures. You must meet the minimum requirements and standards indicated in our Electronic Raffle rules and other applicable WAC requirements.

All information requested in the table of contents will be submitted to the Special Agent assigned to complete your review. The internal control packet must be completed and submitted as scheduled by the Special Agent.

Please contact the Special Agent assigned to your review if you have any questions on this process.

Lacey Headquarters ..... (360) 486-3440  
or toll-free (800)345-2529

Spokane ..... (509)325-7900

Attachment

**P.O. Box 42400, Olympia, WA 98504 | (360) 486-3440  
901 N. Monroe St., Suite 240, Spokane, WA 99201 | (509) 325-7900  
wsgc.wa.gov**

# **INTERNAL CONTROLS**

## **Electronic Raffle Licensee**

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(Licensee Name)

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(Date of Submission)

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(Signature of CEO)

# T A B L E O F C O N T E N T S

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Include the following information, in the order listed below, in your Internal Control document.

- **Organization Chart** – Include your organization chart.
  - Provide a listing that includes the name and title of officers and managers.
  - Provide the location, including address, hours of operation, and contact information, (phone and email), for the Sport Team Charitable Foundation's main office.
  - List the website location used to post raffle information.
- **Scheduled Electronic Raffle Events**
  - Include a schedule, with dates and times of each home game for the season you intend to conduct electronic raffles. (Note: this will need to be updated each year you plan to operate electronic raffles).
  - Include a map of the venue with information regarding how WSGC staff will access the location for inspection (parking, entry into the venue, on-site contact name and phone number, etc.).
- **Electronic Raffle Staffing**
  - Describe whether you will use volunteer members and/or volunteer non-members supervised by a member to staff your electronic raffles. Describe how will you obtain a sufficient number of volunteers to operate electronic raffles.
  - Disclose your estimated electronic raffle staffing needs. Identified by the following functions:
    - Management
    - Sellers (identified by RSU mobile or stationary selling points)
    - Printing room
    - Drawing process
    - Misc. – Such as electronic raffle accounting or system support
- **Electronic Raffle Plan** - Include a copy of your raffle rules and any legal disclaimers used to advertise and describe your electronic raffles.
  - Include your pricing plan(s) for ticket sales including discount levels.
  - Include a basic description of the selling method. Example: Roaming portable ticket sellers and stationary ticket kiosks.
  - Include the number of stationary sales terminals/kiosks you plan to operate. Identify the location of each stationary sales terminal.
  - Identify the number of portable raffle selling units (RSU) and the planned number of roaming sellers. (Note: This may be an estimate and may vary between different game dates and times).
  - Disclose the time ticket sales will end and the drawing will take place. (For example: All sales will end at the 10 minute mark of the 3<sup>rd</sup> quarter and the drawing will take place and the winner announced prior to the midway point of the 4<sup>th</sup> quarter).

➤ **Manual Drawing Process**

- Describe the procedure you will use to close the sales phase of the raffle to ensure all tickets will be printed and the final prize amount prior to the manual drawing. Describe how you will verify all sales have been accounted for and all tickets printed prior to the drawing.
- Describe how you will mix tickets.
- Describe your manual draw process. Include the location of the drawing, who will be present to draw and witness the drawing, and the method of video recording the drawing.
- Describe how you will announce the winner at the stadium. Example: The winning ticket number, the prize amount, and how to claim the prize will be announced several times over the stadium PA system. The stadium scoreboard and stadium monitors will scroll the winning number, the prize amount, and how to claim the prize for approximately five minutes. Specific electronic raffle displays, (how many), will display the winning number, prize amount, and all prize redemption procedures, after the winning ticket number is determined until approximately 30 minutes following the conclusion of the raffle.

➤ **Winning Payout Process**

- Describe your specific payout procedures to include at least the verification of the winning ticket and identification of the winner. Include who will authorize the payout, the location you will make the prize payment, and the method of payment. Describe any other winner verification and payment criteria you will use.

➤ **Secured Access Areas and Equipment**

- Identify each area where electronic raffle equipment will be stored, tickets printed, and the accounting and reconciliation for daily electronic raffle receipts.
- Provide your plan for security and restricting access for each secured area. Include who will be authorized to enter each restricted area.
- Identify the security plan for restricting the access and assignment of RSU units. This should include procedures to verify each volunteer has been authorized and trained by management prior to issuing an RSU device. Include how you will track and account for each RSU device.
- Identify how you will limit access to the electronic system server and software. Identify the person(s) and job title, (This should be limited to raffle managers and IT support).

➤ **Electronic System Components**

- Identify all electronic system components.
- Include the manufacturer's name and software version of the electronic raffle software and the make and model of the computer server operating the software. Also include the make and model of each type of RSU, portable raffle receipt printers, the raffle ticket printers, closed network Wi-Fi system devices, and any other specific equipment used for the conduct of electronic raffles.
- Include procedures for allowing remote access from the manufacturer (WAC 230-16-153)

➤ **Accounting**

- Name the accounting person(s) who will be responsible for the completion of electronic raffle daily, monthly, and annual records.
- Name of the bank, type of account, and account number used for electronic raffle deposits and or prize funds waiting for payment.
- Name the signers on the bank account.
- The procedure for handling cash. For example, if cash is allowed for the purchase of electronic raffle tickets, what is the procedure for ticket sellers handling cash and/or any necessary cash banks used during the electronic raffle event.
- Include whether your organization plans to deduct actual expenses prior to the prize calculation up to two-thousand dollars per raffle as authorized in WAC 230-11-300. Explain how the prize calculation will be determined and identify the types of expenses your organization anticipates deducting.

➤ **Records**

- Provide a copy of your daily and monthly electronic raffle records you will use to comply with electronic raffle rules. These records may be modified to meet your needs however they must contain all required information identified in our standard electronic raffle keeping packet.