



# Washington State Gambling Commission

Protect the Public by Ensuring that Gambling is Legal and Honest

July 7, 2025

Winau Dominik, CFO  
CountR Cash Systems  
Fahrenheitstr. 6  
14532 Kleinmachnow Germany

**RE: CountR TITA System – TITA 2.5.3 - ART 4.23.1.0 - CASHIO Kiosk 2.4.12.0  
JCM MRX Bill Validator for use with the TITA/ART and  
MEI SCN66 Bill Validator to be used with the CASHIO Kiosk.**

**GET Submissions #3142 and #3143 and EGL Submission #23578 & #23579**

Dear Winau Dominick,

Thank you for requesting approval of the TITA/ART System and CASHIO Kiosk and bill validators. We have completed our review.

The TITA/ART System with the JCM MRX bill validator and the CASHIO Kiosk with the MEI SCN66 bill validator are approved for use in Washington State. The approval is contingent on the following requirements.

**Manufacturer Requirements:**

- Ensure only the JCM MRX bill validator with the approved software is used with the TITA/ART system. Any new bill validators must be submitted to us for approval.
- Ensure only the MEI SCN66 bill validator with the approved software is used with the CASHIO Kiosk. Any new bill validators must be submitted to us for approval. In addition, because MEI/CPI is not licensed, only CountR can install, troubleshoot, upgrade or provide any maintenance to the bill validator.
- Ensure any network hub or network router used for connecting the systems is not accessible to patrons.
- Ensure only the ART accounting system is connected to the TITA system. No other accounting system may be connected to the TITA system.
- Ensure there are no external connections to the TITA system (no wireless connections or communication are allowed).
- Ensure the system is only connected to authorized gambling equipment.
- Notification must be made to us ten days prior to installation to ensure time for an onsite inspection.

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**House-Banked Card Game Licensee Requirements:**

An onsite review is required prior to operation to verify compliance with WAC 230-15-755 through WAC 230-15-782. There were some WAC requirements that could not be tested during the review process and will need to be reviewed once the system is installed at a location.

The system will need to be tested at House-Banked Card Game Licensees for at least the following requirements to ensure:

- Internal controls are established to limit access to secure areas for the TITA/ART system and CASHIO kiosks.
- Any network hub or network router used for connecting the systems is not accessible to patrons.
- Only the ART accounting system is connected to the TITA system. No other accounting system may be connected to the TITA system.
- There are no external connections to the TITA system (no wireless connections or communication are allowed).
- The system is only connected to authorized gambling equipment.
- All servers and components that store sensitive information are in a locked secure enclosure with controls in place.
- There is no remote access to the system once installed.
- There are machine entry authorization logs (MEAL) for all entries into a locked area of the system and for accessing the locked areas of the Kiosks (WAC 230-15-773) and (WAC 230-15-782).
- The system is connected to an uninterrupted power supply.
- The requirements for drop boxes/cassettes in TITO enabled bill validators and Kiosks comply with WAC 230-15-779 and WAC 230-15-782. To include being housed in a locked cabinet with separate locks to open the drop box/cassette and have labels on the drop box/cassette with a permanent number clearly visible which corresponds to a permanent number on the gambling table where the bill acceptor is affixed.
- Tickets generated by the system meet the requirements in WAC 230-15-770.
- Reports required by WAC 230-15-773 can be generated.
- The transportation and storing of drop boxes/cassettes comply with WAC 230-15-590 and WAC 230-15-600.
- Proper surveillance coverage of ticket validation system, TITO-enabled bill validators, and ticket redemption kiosks according to WAC 230-15-280.
- The tickets from the locked boxes brought to the count room and accounting department are accounted for as required in WAC 230-15-615 and 230-15-620.

**Tribal Casino Implementation:**

- For Tribal Casinos, ensure internal controls are revised to include new equipment and procedures, and approved by Tribal Gaming Agency and concurred with by Washington State Gambling Commission.

- Any network hub or network router used for connecting the systems is not accessible to patrons.
- Only the ART accounting system is connected to the TITA system. No other accounting system may be connected to the TITA system.
- There are no external connections to the TITA system (no wireless connections or communication are allowed).
- The system is only connected to authorized gambling equipment.
- All servers and components that store sensitive information are in a locked secure enclosure with controls in place.
- There is no remote access to the system once installed
- The system is connected to an uninterrupted power supply.

**Signatures:**

<b>ART – File Name</b>	<b>SHA1 Signature</b>
art-2.4.15.0.jar	04285E3C3A22888A6CBA66812945842389F350EA
ART-Client.exe	B4F78EE2AB04D2E93AF775BC6A24DF2433C8AD9E
ART-Server.exe	731754F35AFFC383BF0EA8BD846F8E01792E5D48
<b>TITA – File Name</b>	
Cata-release.apk	E90F6AF3306325870E549A8A4BB841FDF2814477
proxy.jar	6DC760838F1F130FAC26AFC75A20C5469CC6249C
<b>KIOSK – File Name</b>	
CountR-3.0.6.cosmod	24C62ED9251C369D4ADF8C90127CBE3E7C52E0D6
art-2.4.15.0.jar	04285E3C3A22888A6CBA66812945842389F350EA
<b>Bill Validator/Acceptor Hardware TITA/ART</b>	<b>Model</b>
JCM MRX	MRX-MA020-2R00
<b>Bill Validator/Acceptor Software TITA/ART</b>	<b>SHA1</b>
MRX_MBN_USA_V10506204T	5B9CCE2696C95A5D6F22406C9CBC0E379402ADF6
<b>Bill Validator/Acceptor Software CASHIO Kiosk</b>	<b>SHA1</b>
MEI firmware 6NY570008411 Version 5.70/4.11	91297D9E873B85BCB45737008BCC6D8E1F94287C

Any modifications made to the TITA/ART System and CASHIO Kiosk or to the bill validators used with the equipment must be submitted to us for additional testing and review. We reserve the right to investigate and reevaluate this equipment if we determine that such a review is necessary to ensure compliance with applicable rules or laws in Washington.

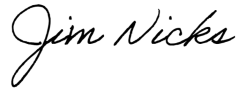
Thank you for your cooperation during this process. We appreciate your desire to comply

CountR  
TITA/ART System and CASHIO Kiosk

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with our regulations. If you have any questions regarding this matter, please contact me at (509) 481-1573.

Sincerely,

A handwritten signature in cursive script that reads "Jim Nicks".

Jim Nicks  
Assistant Director  
Enforcement and Operations Division

cc: Tony Hughes, Agent in Charge, Regulation and Enforcement Unit  
Dan Wegenast, Agent in Charge, Tribal Gaming Unit  
File