

The following excerpts are taken from the Casino Terms & Conditions and Operating Guidelines (CTCOG), *Gaming Liquor and Cannabis Act* (GLCA) and Gaming, Liquor and Cannabis Regulation (GLCR). For cross-referencing purposes, the italicized information contained in parentheses is the corresponding section in the CTCOG from which the information was obtained (information not contained in the corresponding section of the CTCOG was taken from the GLCA or GLCR). The CTCOG, GLCA and GLCR are available on AGLC's website at aglc.ca.

1. DEFINITIONS (1.1)

1.1 In this document,

- a) "Advisor" means all independent advisors (cash cage advisor or count room advisors).
- b) "AGLC" means the Alberta Gaming, Liquor and Cannabis Commission.
- c) "Board" means the Board of AGLC.
- d) "Bona fide member of a licensed charity" means an individual who is listed or named in the licensed charity's official records as a current member in good standing of the licensed charity.
- e) "Casino facility licensee" means the individual, partnership or corporation holding a casino facility licence which authorizes the operation of a facility in which a casino event may be conducted and is the business entity named as the casino retailer in the retailer agreement respecting electronic games.
- f) "Casino Terms & Conditions and Operating Guidelines (CTCOG)" means the AGLC's set of policy requirements and operating guidelines which apply to casino events held in a licensed casino facility.
- g) "Charitable Gaming Policies Handbook" means AGLC's set of policies, policy standards and procedures that apply to gaming licensing eligibility and the use of gaming proceeds.
- h) "Charity worker" means a registered gaming worker who is a paid employee of a First Nation Charity that is working in the capacity of a general manager, alternate general manager, banker, cashier, chip runner, count room supervisor, sorter, counter, recorder or amalgamator.
- i) "Discrepancy Report" means a report prepared by the casino facility licensee, licensed charity, registered worker and/or volunteer regarding a breach of the casino terms and conditions, security breach or any other illegal activity.
- j) "Event" means all casino games conducted during a specified period of time indicated on the casino licence.
- k) "Inspector" means an inspector of AGLC, any police officer as defined in the *Police Act* or a person designated by AGLC as an inspector under the *Gaming, Liquor and Cannabis Act*.
- l) "Licensed charity" means the charitable or religious organization holding a casino licence authorizing a casino event within a licensed casino facility or other approved location.
- m) "Minor" means a person under the age of 18 years.
- n) "Registered gaming worker" means a person registered with AGLC to perform the function(s) specified in their registration.

- o) “Volunteer” means an individual who works without remuneration at a casino event for a licensed charity.

2. LEGISLATION AND BOARD POLICIES (1.2)

- 2.1 Casino events, facility licensees, licensed charities and registered gaming workers must operate in accordance with the *Gaming, Liquor and Cannabis Act* (GLCA), the Gaming, Liquor and Cannabis Regulation (GLCR) and Board policies established under the legislation including these terms and conditions and all federal, provincial and municipal laws.
- 2.2 All references in this document to “terms and conditions” or “operating guidelines” are considered to be references to Board policies.
- 2.3 Non-compliance with the legislation or Board policies contained in this document may result in disciplinary action up to and including suspension or cancellation of licence.

3. LICENSING AND REGISTRATION (GLCR)

- 3.1 A casino licence issued pursuant to section 19(d) of the GLCR authorizes a casino.
- 3.2 An applicant for a casino licence must be a charitable or religious organization and must satisfy the Board that the proceeds from the casino will be used for a charitable or religious object or purpose approved by the Board.

4. ALBERTA GAMING, LIQUOR AND CANNABIS COMMISSION (AGLC) (1.4)

- 4.1 AGLC is the province’s gaming authority, responsible for conducting and managing provincial lotteries (as defined in section 1(1) (x) of the GLCA) and for licensing and regulating charitable gaming activities (GLCA section 1(1) (h)) such as casinos.
- 4.2 AGLC issues gaming licences to eligible charitable and religious groups to conduct casino events.
- 4.3 Facility licences are issued by AGLC and the facility licensees must operate under the charitable gaming model of the province. A casino event may only occur under a casino licence issued by AGLC to an eligible charitable or religious group.
- 4.4 The administration and monitoring of licensed casino facilities and casino events is the responsibility of AGLC.
- 4.5 The casino facility licensee is responsible for ensuring both registered gaming workers and the licensed charity have access to the CTCOG.
- 4.6 Training is available to applicants and licensed charities through AGLC’s Gaming Information for Charitable Groups (GAIN) program. The GAIN sessions include information on the following topics:
 - a) the licensing application process;
 - b) eligibility for gaming licensing;
 - c) approved use of gaming proceeds;
 - d) reporting requirements following a gaming event; and

e) legislation, regulation and policy that govern the conduct of gaming events.

Further information about the GAIN program may be obtained on AGLC's website at aglc.ca or by contacting AGLC at 1-866-307-7499 (toll free).

5. CONTACTING AGLC (1.5)

5.1 Written communication may be addressed to any of the following:

Alberta Gaming, Liquor and Cannabis Commission
50 Corriveau Avenue
St. Albert, Alberta T8N 3T5
Fax: 780-447-8912

Alberta Gaming, Liquor and Cannabis Commission
310, 6715 - 8 Street N.E.
Calgary, Alberta T2E 7H7
Fax: 403-292-7302

Alberta Gaming, Liquor and Cannabis Commission
3, 7965 – 49 Avenue
Red Deer, Alberta T4P 2V5
Fax: 403-314-2660

Alberta Gaming, Liquor and Cannabis Commission
100-11039 78 Avenue
Grande Prairie, Alberta T8W 2J7
Fax: 780-832-3006

Alberta Gaming, Liquor and Cannabis Commission
655 WT Hill Blvd South
Lethbridge, Alberta T1J 1Y6
Fax: 403-331-6506

5.2 The following is a list of AGLC office telephone numbers. Telephones will be answered by machine when staff is not available or calls are outside normal office hours. Normal office hours are 8:15 a.m. to 4:00 p.m. Monday to Friday, excluding holidays.

Customer Care Centre	1-825-480-4755
St. Albert (Head Office):	1-825-480-4755
Calgary:	403-292-7300
Red Deer:	403-314-2656
Grande Prairie:	780-832-3000
Lethbridge:	403-331-6500
Gaming Irregularities Only:	1-800-742-7818

5.3 The Internet address of AGLC is aglc.ca.

6. MINORS (1.10)

6.1 A licensed charity must not use minors as volunteers for a casino.

7. EXTENDING CREDIT (1.11)

7.1 Cashing personal cheques or extending credit in any form by the casino facility licensee, office staff, registered gaming workers, volunteers, charity workers or any other casino or facility staff is prohibited.

In exception to the above, a casino facility licensee may accept a cheque that is:

- a) a "casino" cheque issued from the casino facility licensee's bank account, which has "verified win" or "non-verified win" imprinted on the face of the cheque (see Section 18.13), and is made payable to the bearer; or
- b) a cash call cheque.

8. CASINO ACCESS (1.12)

8.1 Casino facility licensees, casino licensees (licensed charitable organizations) and registered gaming workers are required to cooperate fully with AGLC inspectors and police officers attending at a casino. A licensee must, on the request of an inspector, AGLC or an employee of AGLC:

- a) assist the inspector in carrying out an inspection; and
- b) provide the inspector with records, documents, books of account and receipts and provide a place where they may be inspected, audited, examined or copied.

8.2 A field technician employed by or working on behalf of AGLC in a casino facility installing, servicing or removing electronic gaming or gaming related equipment has been designated by AGLC as an inspector pursuant to section 98(1) of the GLCA.

8.3 An auditor or person employed or working on behalf of AGLC in a casino facility has been designated by AGLC as an inspector pursuant to section 98(1) of the GLCA.

9. HOURS OF OPERATION (1.13)

9.1 Casinos may operate seven days per week, as follows:

- a) casino table games to a maximum of 17 consecutive hours, commencing no earlier than 10:00 am, and ending no later than 3:00 am;
- b) gaming terminals:
 - i) slot machines (including electronic table games) up to 24 hours per day, provided a casino event licence is in effect for that game day and the extra slot machine hours in excess of the hours the table games operate are adjoined; and
 - ii) video lottery terminals (VLTs) only during the hours the location is open to the public and the Class A Minors Prohibited licence is in effect.
- c) casino poker rooms up to 24 hours per day provided the conditions specified in CTCOG Subsection 9.18.6 c) are met.

9.2 Casinos may remain open Christmas Day. Casino facility licensees may opt to operate:

- a) table games and gaming terminals; or

- b) gaming terminals only, no charity casino licence is required.

10. TABLE GAME TOURNAMENTS (1.17)

- 10.1 Tournaments may only be held during a licensed casino event (see CTCOG 1.13).
- 10.2 A tournament may not adversely affect normal revenues for the licensed charity. The casino facility licensee is responsible for reimbursing the prize pool for any free/promotional entries provided as part of the tournament.
- 10.3 Casino facility licensees must split the revenue generated from entry fees, re-buys and add-ons with the charity holding the event licence as follows:
 - a) in tournaments where entry fees are \$150.00 and less, 10 per cent of the revenue generated shall be allocated as compensation to the licensed charity;
 - b) in tournaments where entry fees are greater than \$150.00, 2.5 per cent of the revenue generated shall be allocated as compensation to the licensed charity; and
 - c) the remaining revenue generated shall be allocated to the casino facility licensee in order to pay all prize amounts.

11. SLOT OPERATIONS/RENUMERATION (16.4/16.7)

- 11.1 Services and space provided for the operation of slot machines is the sole responsibility of the casino facility licensee and does not involve the charity licensee volunteers.
- 11.2 Fifteen per cent of the total net sales generated by slot machines is allocated to licensed charities.

12. LICENSED CHARITY'S ROLES AND RESPONSIBILITIES (2.4)

- 12.1 The licensed charity must operate the casino according to:
 - a) the licence which includes information pertaining to the location, number of games, dates and hours of operation;
 - b) the operating requirements provided in the CTCOG (available at aglc.ca);
 - c) any special conditions required by the Board;
 - d) the house rules of the casino facility which must not conflict with the CTCOG; and
 - e) all municipal, provincial and federal laws.
- 12.2 Licensed charities must immediately report to AGLC any irregularities, theft, fraud cheating at play or violations of policy in the conduct of its licensed casino event and in the use of gaming proceeds.
- 12.3 Where gaming revenue or gaming proceeds are missing due to suspected theft or fraud, the licensed charity must not initiate any civil action against, or enter into any repayment agreement or other agreements with, persons suspected of being responsible for the missing gaming revenue or proceeds.

13. CASINO FACILITY AND SERVICE AGREEMENT (2.5)

- 13.1 Casino facility licensees must provide each licensed charity with a Casino Facility and Service Agreement which establishes fixed fees or charges, excluding GST, for the operation of the casino. Casino facility service agreements must not guarantee returns or be used to entice financial inducements by either party.
- 13.2 The Casino Facility and Service Agreement must include a provision that at the completion of the casino event it will be determined if the total of the fixed fees and charges of the casino facility licensee exceeds:
- a) for Edmonton and Calgary casinos, 50 per cent of the net table game casino proceeds;
 - b) for St. Albert casino, 65 per cent of the net table game casino proceeds;
 - c) for casinos outside Edmonton and Calgary with 350 or more slot machines (including electronic table games), 65 per cent of the net table game casino proceeds, and
 - d) for casinos outside Edmonton, Calgary and St. Albert with 349 or less slot machines (including electronic table games), 75 per cent of the net table game casino proceeds.
- If such fees and charges exceed the above net proceeds, the casino facility licensee will only be entitled to payment of an amount equivalent to 50, 65 or 75 per cent of the net table game casino proceeds.
- 13.3 For casinos outside of Edmonton and Calgary that increase their number of slot machines (including electronic table games) from 349 or less to 350 or more, the split of 65/35 of the net table game casino proceeds will be effective Day 1 of the casino event following the installation of the additional slot machines.
- 13.4 GST (if applicable) is paid from the charity pool at the end of each quarter. The amount paid will be based on the casino facility operator fees from that quarter.
- 13.5 The casino facility licensee may keep table game surpluses generated at casino events to cover table game deficits which may occur at subsequent casino events. Net accumulated surpluses that exist at the end of each pooling period will be collected by AGLC through electronic funds transfer.
- 13.6 The casino facility licensee must be responsible for the applicable percentage of losses (net proceeds after prizes are paid is negative), in Edmonton and Calgary 50 per cent; St. Albert 65 per cent; outside of Edmonton and Calgary with 350 or more slot machines 65 per cent; and all others 75 per cent.

14. ADVISOR CONTRACTS (2.7)

- 14.1 The fee stated on an advisor's contract must be the actual amount charged to the charity upon the conclusion of the casino event, as indicated on the Casino Track Reconciliation of Casino Win/Loss and Pool Contribution form.

15. CASINO EXPENSES (2.8)

- 15.1 Licensed charities are responsible for the following casino expenses:
- a) food and refreshments for volunteers while working at the casino;
 - b) cash cage advisor and count room advisor fees;
 - c) pool administration costs; and
 - d) any other expenses approved by the Board.

- 15.2 The following expenses must be paid in accordance with AGLC's approved methods of payment outlined in Section 4.4 of the Charitable Gaming Policies Handbook at the conclusion of the casino event:
- a) food and refreshment expenses for volunteers while they are working at the casino event, must not exceed:
 - i) Edmonton, St. Albert and Calgary casinos: \$1175 (GST included);
 - ii) All others: \$705 (GST included).
 - b) cash cage advisor fees must not exceed:
 - i) Edmonton, St. Albert and Calgary: \$1488/event (plus applicable taxes) plus \$45/hour for each extra hour the table games are open longer than 14 hours/day (e.g. if table games are open for 16 hours on Day 1 and 17 hours on Day 2, an advisor may earn an extra 5 hours pay or \$225).
 - ii) all others: \$1074/event (plus applicable taxes) plus \$45/hour for each extra hour the table games are open longer than 14 hours/day).
 - c) count room advisor fees must not exceed:
 - i) Edmonton, St. Albert and Calgary: \$661 (plus applicable taxes);
 - ii) All others: \$578 (plus applicable taxes).
- 15.3 Where casino net proceeds are insufficient to cover food and refreshment expenses and advisor fees, the casino facility licensee will reimburse the charity for these costs. The casino facility licensee will be reimbursed for these costs through a reduction of the regular AGLC electronic funds transfer, which collects the net casino proceeds.
- 15.4 The pool administration costs and casino licence fees will be paid out of the pool by AGLC at the end of the pooling period, prior to the distribution of casino proceeds.
- 15.5 Casino revenue from non-electronic table games can be used to pay prizes and approved expenses needed to operate the casino event. The remaining gaming funds from non-electronic table games are casino proceeds. The commissions paid to licensed charities from slot machines form part of the licensed charity's casino proceeds. The licensed charity's casino proceeds, which are provided by AGLC, must be deposited to the licensed charity's casino bank account.

16. CASINO POOLING (2.9)

- 16.1 Casino pooling means the collection of all casino proceeds (and/or losses) over a 3 month period of time (as specified in Section 23.3) from events held in a licensed facility or facilities. The proceeds are placed into two separate pools as follows:
- Pool A - Table Game Proceeds: refers to the funds remaining after the payment of approved prizes and approved casino event expenses; and
- Pool B - Commissions from Electronic Games: refers to the commissions paid to the licensed charities from electronic games played on slot machines (see CTCOG Subsections 16.7.1 c)).
- 16.2 Casino pools are administered by AGLC for the benefit of the licensed charities.

- 16.3 Licensed charities must pool casino proceeds (and/or losses) within the same pooling period as follows:
- a) licensed charities conducting casinos in communities with two or more casino facility licensees must pool net casino proceeds (and/or losses) with all charities licensed in the same community within the same pooling period (Exception: Ace Casino Blackfoot in Calgary does not pool its table game proceeds with other casinos in Calgary);
 - b) licensed charities conducting casinos in St. Albert and Camrose must pool net casino proceeds (and/or losses) with all charities within the same pooling period; and
 - c) licensed charities must submit net casino proceeds to the casino facility licensee at the end of each casino event. The facility licensee must deposit the net casino proceeds the next business day. AGLC will obtain the net casino proceeds from the facility licensee through electronic funds transfer. AGLC will notify the casino facility licensee of the required amount of the transfer.
- 16.4 The pooling period is the same as the quarterly casino draw period. Quarters are January-March, April-June, July-September and October-December.
- 16.5 After the pooling period is over, AGLC will provide each licensed charity with a statement of distribution of pooled funds. This statement will include the following information:
- a) the total pooled funds received;
 - b) any re-imbusement of event losses;
 - c) the interest earned on pooled funds;
 - d) the final payments made to AGLC for the quarterly licence fees and the pool administration costs;
 - e) GST payment to casino facility operator;
 - f) other adjustments as required;
 - g) the number of charity shares; and
 - h) the amount disbursed to each charity.
- 16.6 AGLC will deposit these funds to each charity's approved casino bank account through electronic funds transfer (EFT). If unable to make an EFT, AGLC will mail a cheque to the licensed charity for deposit to its approved casino bank account.
- 16.7 Advances to any licensed charity from the pool prior to the end of the pooling period are prohibited.
- 16.8 In the event Pool A is in a deficit position at the end of the pooling period, AGLC will administer the pool as follows:
- a) applications from charities for reimbursement of food and refreshment expenses and advisor fees will be added to the overall pool deficit;
 - b) claims for the charities' portion of the float losses will be added to the pool deficit;
 - c) pool administration costs and licence fees will be added to the pool deficit; and
 - d) once the overall Pool A deficit has been calculated, the deficit will be offset by an equal amount from Pool B containing the commissions from electronic games played on slot machines accumulated during the pooling period.

Note: If the commissions from slot machines do not offset the deficit, each charity will be required to reimburse an equal share of the deficit to the pool.

17. ELIGIBILITY REQUIREMENTS FOR VOLUNTEER STAFF OR CHARITY WORKERS (3.1)

17.1 Eligibility requirements for volunteer staff or charity workers are as follows:

- a) only bona fide members of the licensed charity or employees of a First Nation Charity shall work in the positions of general manager, banker, cashier, count room supervisor or advisor (when performed by a volunteer). The licensed charity may use non-members, on a volunteer basis, to fill other positions as required. Licensed charities whose members are disabled may accept outside volunteer help for all positions;
- b) charity workers must be registered with AGLC and may only work at First Nation casinos. Additional information regarding eligibility requirements for charity workers may be found in Section 3.2 of the Host First Nation Charitable Casino Policies Handbook (HFNCCPH);
- c) charity workers' wages shall be subject to AGLC approval;
- d) A person is not eligible to work in a casino if the person:
 - i) has at any time been charged with or convicted of:
 - an offence under the *Criminal Code* (Canada), the *Excise Act* (Canada), the *Food and Drugs Act* (Canada) or the *Income Tax Act* (Canada);
 - an offence under the *Controlled Drugs and Substances Act* (Canada), other than under 4(1) of that Act for possession of any substance in Schedule II to that Act; or
 - an offence under a foreign Act or regulation that, in the Board's opinion, is substantially similar to an offence referred to in subclause i);

and, if in the Board's opinion the offence is sufficiently serious that it may detract from the integrity with which gaming activities or provincial lotteries are to be conducted in Alberta or may be detrimental to the orderly or lawful conduct of activities authorized by a liquor licence or a registration relating to liquor, or

- ii) has, within the five years prior to the submission of the application, been serving a term of imprisonment of three years or more.

17.2 A minimum of 25 volunteers are required for a 16-50 game casino. A minimum of 15 volunteers are required for a 15 game or less casino. Volunteers or charity workers are required to fill the following positions:

- a) general manager(s) and alternate;
- b) banker;
- c) cashier;
- d) chip runner;
- e) count room supervisor; and
- f) count room staff (5).

17.3 Paid staff of the licensed group can work any position, provided:

- a) they are bona fide members of the licensed charity;
- b) they volunteer their services outside normal working hours; and
- c) they do not fill the following positions:
 - i) general manager;

- ii) alternate general manager;
- iii) banker; or
- iv) count room supervisor.

17.4 AGLC may provide modified requirements for the charity to reduce charity staffing in extenuating circumstances and combine charity roles to accommodate this reduction.

18. CONDUCT (3.2)

18.1 All volunteer staff/charity workers must have their roles assigned through CasinoTrack and conduct themselves in accordance with the CTCOG.

18.2 No volunteer staff or charity worker shall work more than one position during the casino licence period except:

- a) the general manager may assign a count room worker to witness table closing chip counts. This must not interfere with count room duties;
- b) in casinos outside of Edmonton, Calgary and St. Albert those individuals assuming the positions of banker, cashier and chip runner may, once their cash cage duties have been concluded, also work in the various count room positions; the one exception being the banker, who must not be allowed to assume the position of count room supervisor; and
- c) the charity may combine the counter with either the duties of the sorter or the recorder (not both). Duties specific to the sorter or recorder can be found in Sections 3.8, 3.10, and 8.3.

18.3 Volunteer staff and charity workers must wear a name badge while on duty showing first or common name, position, and date of casino.

18.4 All volunteer staff and charity workers are prohibited from playing casino games or gaming terminals (including slot machines, electronic table games and VLTs) where they are working for the duration of their licensed charity's event.

18.5 Volunteer staff and charity workers must not use or be under the influence of liquor, cannabis or illegal drugs at a casino event. Any use of prescription (including cannabis for medical purposes) or off-the-shelf medications while working a casino event must be consistent with the casino facility licensee's policies regarding their use and must not interfere with the ability of volunteer staff and charity workers to perform their duties.

18.6 Volunteer staff and charity workers are prohibited from cashing cheques or extending credit.

18.7 Personal possession of chips by volunteer staff and charity workers is prohibited and must be reported immediately to AGLC by the general manager.

19. GENERAL MANAGER AND ALTERNATE GENERAL MANAGER (3.3)

19.1 The general manager is responsible for all aspects of the casino and operates the event in consultation with the games manager to ensure the casino is conducted in accordance with the CTCOG.

19.2 The general manager ensures all volunteer staff/charity workers are present for the casino event prior to their scheduled shift.

- 19.3 The general manager may temporarily perform the duties of any volunteer staff/charity worker. Should the position being covered not return in a reasonable period (example: one hour) or is not expected to return, the general manager may assign another volunteer staff/charity worker to the role (Discrepancy Report required).
- 19.4 Prior to the end of the event, the general manager will sign off on all discrepancy reports in addition to the advisor or games manager.
- 19.5 The general manager will ensure the casino facility licensee or designate provides a cheque at the end of the event for the cost of the advisor fees and concession fees.

20. BANKER (3.4)

- 20.1 The banker supervises the cash cage and is directly accountable to the general manager.
- 20.2 The banker is responsible to ensure:
 - a) the security and control of the chip/cash inventory during their shift; and
 - b) the cashiers retain personal control of chips and cash while on duty.

21. CASHIER (3.5)

- 21.1 Accountable to the banker, the cashier provides services to casino patrons, exchanging casino chips for cash. The cashier must not:
 - a) sell or exchange any currency for chips;
 - b) conduct any cash outs over \$200 without the transaction being witnessed by the general manager, banker or advisor; and
 - c) accept chips from another casino facility.
- 21.2 The cashier maintains the security of the chips and cash in their station while on duty, securing their station when not in use or on break.

22. CHIP RUNNER (3.6)

- 22.1 Using CasinoTrack, the chip runner acts as an intermediary between the charity and the casino facility:
 - a) verifying the accuracy of chips while accepting, opening, closing or returning game tables on the floor; and
 - b) ensuring chips are accurately transported to and from the chip bank and game tables.
- Note: The chip runner may assist the general manager during pull of drop boxes.

23. COUNT ROOM SUPERVISOR (3.7)

- 23.1 The count room supervisor is directly accountable to the general manager for supervision of count room procedures and count room staff and ensuring the count room is secured while on duty.

23.2 At the end of the count, the count room supervisor will generate the Master Revenue Report and Count Room Drop Box Verification on CasinoTrack.

24. SORTER (3.8)

24.1 The sorter is responsible for preparing the drop boxes for the count room team, including:

- a) emptying a drop boxes contents on the table;
- b) showing the camera the box is empty; and
- c) sorting the contents for the counter.

25. COUNTER (3.9)

25.1 The counter is responsible for:

- a) counting the contents of each individual box identified by the "Box ID Card";
- b) reporting the totals to the recorders; and
- c) providing the bills to the amalgamator for final verification.

Note: The counter may assist the sorter.

26. RECORDER (3.10)

26.1 The recorder enters information provided by the counter into the CasinoTrack system for each box identified by the "Box ID Card".

27. AMALGAMATOR (3.11)

27.1 The amalgamator is responsible for:

- a) performing the final count of the contents of each individual drop box identified by the "Box ID Card";
- b) reporting the totals to the Count Room Supervisor; and
- c) placing cash of the same denomination in bundles of one hundred (where applicable) after the totals are verified from the first count.