



Mille Lacs Band of Ojibwe Indians
Gaming Regulatory Authority
Detailed Gaming Regulations

SURVEILLANCE

Document No. DGR – 9

Effective: August 30, 2016

I. SURVEILLANCE SYSTEM.

Section 1. Each Gaming Enterprise shall have, maintain and operate a staffed surveillance operations room in a secured location whereby gaming events are monitored and reviewed. Each Gaming Enterprise shall also, in the same or alternate location, have, maintain and operate a surveillance equipment room whereby the areas under surveillance are continually recorded.

- A. The surveillance operations room must be maintained and operated from a staffed surveillance room and shall provide surveillance over any Mille Lacs Band owned Gaming Enterprise. Surveillance room staff shall be comprised of employees of the Gaming Regulatory Authority under the day to day supervision of the Surveillance Operations Manager.
- B. The entrance to the surveillance operations room shall be appropriately secured to prevent unauthorized access.
- C. Access to the surveillance operations rooms, viewing rooms and satellite locations (any office with surveillance output, equipment rooms) shall be limited to Surveillance employees, designated employees and other persons authorized.
 - 1. Lists of authorized individuals who may be admitted to the surveillance operations rooms, viewing rooms and satellite locations must be approved by the GRA Board annually. Persons not included on the list of approved individuals will only be allowed access with approval of one of the following: Director, Assistant Director, Operations Manager, Technical Manager and Investigators.
 - 2. Surveillance Operations rooms and Security Dispatch rooms shall maintain a sign-in log of persons entering these areas who are not included on the approved access list. Surveillance and Security viewing rooms and satellite locations shall maintain sign-in logs of persons viewing coverage in these areas.
 - 3. The Director of the OGR&C or designee shall notify the GRA Board at or before its next regularly scheduled Board meeting if persons not included on the list of approved individuals are admitted to any surveillance operations rooms, viewing rooms or satellite locations.
- D. Surveillance shall be under the control and supervision of the Gaming Regulatory Authority. Each Gaming Enterprise shall have access to electronic surveillance output for management purposes.
- E. All recordings, equipment and data rights are solely reserved by the GRA and may not be accessed without the prior expressed consent of the GRA. This may include, but is not limited to: recorders, hard drives, monitors, cameras, cables, desktops, software, storage servers, compact disks (CDs), digital video disks (DVDs), etc.
- F. Unless acting as a representative of the GRA, no one shall clean, operate, obstruct the view of or tamper with any Surveillance System without prior consent of one of the following: Director, Assistant Director, Operations Manager, and Technical Manager.
- G. Persons whose employment with the Surveillance Department does not end in good standing will not be eligible for employment within the Gaming Enterprises without prior approval of the Director of the OGR&C, Assistant Director and Operations Managers.
- H. Persons whose employment with the Surveillance Department ends for any reason will be excluded from participating in Card and Table Games at any Gaming Enterprise for at least six (6) months from the date of separation from employment.



Mille Lacs Band of Ojibwe Indians
Gaming Regulatory Authority
Detailed Gaming Regulations

SURVEILLANCE

Document No. DGR – 9

Effective: August 30, 2016

-
- I. Surveillance staff shall have unimpeded access to all satellite surveillance equipment located outside of the surveillance operations room and the surveillance equipment room, to allow for maintenance and inspection of equipment, access logs and override capability.
 - J. In the event of power loss to the Surveillance System, an auxiliary or backup power source must be available and capable of providing immediate restoration of power to all elements of the surveillance system that enable Surveillance employees to observe all areas mandated by the standards established in this regulation. Auxiliary or backup power sources such as a UPS System, backup generator, or an alternate utility supplier, satisfy this requirement. All auxiliary power supplies controlled by the Gaming Enterprise must be maintained and put into operation when circumstances dictate.
 - K. The Surveillance System must include date and time generators that possess the capability to display the date and time of recorded events on video and digital recordings. The displayed date and time must not significantly obstruct the recorded view.
 - L. The surveillance operations room must be staffed at all times by employees trained in the use of the equipment with knowledge of the games and house rules.
 - M. Each camera required by the standards in this section must be installed in a manner that will prevent it from being readily obstructed, tampered with or disabled by patrons or associates.
 - N. Each camera required by the standards in this section must possess the capability of having its picture displayed on a monitor and recorded. The Surveillance System must include sufficient numbers of monitors and recorders to simultaneously display and record multiple gaming and count room activities, and record the views of all dedicated cameras and motion activated dedicated cameras.
 - O. A periodic inspection of the Surveillance System must be conducted. When a malfunction of the Surveillance System is discovered, the malfunction and necessary repairs must be documented and repairs initiated within seventy-two (72) hours.
 1. In the event of a dedicated camera malfunction, or software communication malfunction, the Gaming Enterprise or the Surveillance Department shall immediately provide alternative camera coverage or other security measures (such as additional supervisory or security associates) to protect the subject activity.
 2. Surveillance technicians must be notified of any camera or surveillance system that has malfunctioned for more than twenty-four (24) hours. Surveillance Operations managers will determine if alternate security measures are necessary and/or implemented.
 3. The GRA Board must be notified of any camera(s) or surveillance system(s) mandated by the standards established in this regulation that has malfunctioned for more than twenty-four (24) hours and the alternative security measures being implemented.

II. SURVEILLANCE SYSTEM REQUIREMENTS WITH RESPECT TO SPECIFIC GAMES AND GAMING MACHINES.

Section 1. Bingo.

- A. Monitor the bingo ball drawing device or random number generator, which must be recorded during the course of the draw by a dedicated camera with sufficient clarity to identify the balls drawn or numbers selected.
- B. Monitor and record the game board and the activities of the employees responsible for drawing, calling, and entering the balls drawn or numbers selected.



Mille Lacs Band of Ojibwe Indians
Gaming Regulatory Authority
Detailed Gaming Regulations

SURVEILLANCE

Document No. DGR – 9

Effective: August 30, 2016

C. Coverage adequate to identify associates accessing the bingo storage area.

Section 2. Pull Tabs. Coverage adequate to identify associates accessing the storage area.

Section 3. Card Games. Except for card game tournaments, a dedicated camera(s) with sufficient clarity must be used to provide:

- A. An overview of the activities on each card table surface, including card faces and cash and cash equivalents;
- B. An unobstructed view of all posted progressive pool amounts; and
- C. New and used playing cards to be issued to a table must be maintained in a location with appropriate surveillance coverage.

Section 4. Card Game Tournaments.

- A. A dedicated camera(s) must be used to provide an overview of tournament activities, and any area where cash or cash equivalents are exchanged.
- B. New and used playing cards to be issued to a table must be maintained in a location with appropriate surveillance coverage.

Section 5. Table Games.

- A. Each table game area with sufficient clarity to identify patrons and dealers.
- B. Each table game surface with sufficient coverage and clarity to simultaneously view the table bank and determine the configuration of wagers, card values, and game outcome. Satisfaction of the coverage requirements may require multiple cameras of different types.

Section 6. Progressive Table Games. Each progressive table game with a progressive jackpot of \$25,000.00 or more must be monitored and recorded by dedicated cameras that provide coverage of:

- A. The table surface, sufficient that the card values and card suits can be clearly identified;
- B. An overall view of the entire table with sufficient clarity to identify patrons and dealer; and
- C. A view of the progressive meter jackpot amount. If several tables are linked to the same progressive jackpot meter, only one meter need be recorded.

Section 7. Video Games of Chance (VGCs).

- A. VGCs offering a payout of more than \$250,000.00 (excluding bonus rounds) must be monitored and recorded by a dedicated camera(s) to provide coverage of:
 1. All patrons and associates at the VGC, and
 2. The face of the VGC, with sufficient clarity to identify the payout line(s) of the VGC.
 3. The coverage required above does not require one dedicated camera per VGC if one dedicated camera is able to provide the required coverage for more than one VGC.
- B. In-house progressive VGCs. In-house progressive VGCs offering a base payout amount (jackpot reset amount) of more than \$100,000.00 must be monitored and recorded by a dedicated camera(s) to provide coverage of:
 1. All patrons and associates at the VGC; and
 2. The face of the VGC, with sufficient clarity to identify the payout line(s) of the VGC.
 3. The coverage required above does not require one dedicated camera per VGC if one dedicated camera is able to provide the required coverage for more than one VGC.
- C. Wide-area progressive VGCs. Wide-area progressive VGCs offering a base payout amount of more than \$250,000.00 and monitored by an independent vendor utilizing an on-line progressive computer system must be monitored and recorded by a dedicated camera(s) to provide coverage of:



Mille Lacs Band of Ojibwe Indians
Gaming Regulatory Authority
Detailed Gaming Regulations

SURVEILLANCE

Document No. DGR – 9

Effective: August 30, 2016

1. All patrons and associates at the VGC; and
2. The face of the VGC, with sufficient clarity to identify the payout line(s) of the VGC.
3. The coverage required above does not require one dedicated camera per VGC if one dedicated camera is able to provide the required coverage for more than one VGC.

III. SURVEILLANCE SYSTEM REQUIREMENTS WITH RESPECT TO CAGE/VAULT AND COUNT ROOMS.

Section 1. Monitor and record a general overview of activities occurring in each cage and vault area with sufficient clarity to identify associates within the cage and patrons and associates at the counter areas and to confirm the amount of each cash transaction.

Section 2. Each cashier station must be equipped with one (1) dedicated overhead camera covering the transaction area.

Section 3. The cage or vault area in which fills and credits are transacted must be monitored and recorded by a dedicated camera or motion activated dedicated camera that provides coverage with sufficient clarity to identify the chip values and the amounts on the fill and credit slips. Controls provided by a computerized fill and credit system may constitute an adequate alternative to viewing the amounts on the fill and credit slips.

Section 4. Kiosks: the surveillance system must monitor and record a general overview of activities occurring at each kiosk with sufficient clarity to identify the activity and the individuals performing it, including maintenance, drops or fills, and redemption of wagering vouchers or credits.

Section 5. Soft Count. Monitor and record with sufficient clarity all areas where currency may be stored or counted, and must include the following:

- A. Soft count room, including all doors to the soft count room, all drop boxes, safes, counting surfaces and all Count Team associates;
- B. The counting surface area must be continuously monitored and recorded by a dedicated camera during the soft count;
- C. The drop box storage rack or area by a dedicated camera or a motion-activated dedicated camera; and
- D. For count rooms utilizing currency counters and currency sorters, the Surveillance System must possess the capability to monitor and record all areas where currency is sorted, stacked, counted, verified or stored during the count process. Coverage of the currency counting machines and currency sorting machines must be sufficiently clear to view the currency input, output and reject areas.

V. VIDEO RECORDING AND DIGITAL RECORD RETENTION.

Section 1. All video recordings and digital records of coverage provided by dedicated cameras or motion-activated dedicated cameras required by the standards in this regulation must be retained for a minimum of seven (7) days.

Section 2. Recordings involving suspected or confirmed gaming crimes, unlawful activity or detentions by security associates, must be copied and retained for a minimum of one (1) year.

Section 3. Duly authenticated copies of video recordings and digital records must be provided to the NIGC and GRA Board upon request.



Mille Lacs Band of Ojibwe Indians
Gaming Regulatory Authority
Detailed Gaming Regulations

SURVEILLANCE

Document No. DGR – 9

Effective: August 30, 2016

VI. RETENTION LOG. Logs maintained to demonstrate compliance with the storage, identification, and retention standards required in this regulation.

VII. MALFUNCTION AND REPAIR LOG.

Section 1. Surveillance employees shall maintain a log or alternative procedure approved by the GRA Board that documents each malfunction and repair of the Surveillance System as defined in these regulations.

Section 2. The log must state:

- A. Time;
- B. Date;
- C. Nature of each malfunction;
- D. The efforts expended to repair the malfunction;
- E. Date of each effort;
- F. Reasons for any delays in repairing the malfunction;
- G. Date the malfunction is repaired; and
- H. Where applicable, any alternative security measures that were taken.

Section 3. Information entered onto the log must be maintained for at least five (5) years.

VIII. SURVEILLANCE LOG.

Section 1. Surveillance employees shall maintain a log of all surveillance activities.

Section 2. Such log must be stored securely within the Surveillance Department.

Section 3. At a minimum, the following information must be recorded in a surveillance log:

- A. Date;
- B. Time commenced and terminated;
- C. Activity observed or performed; and
- D. The name or license credential number of each employee who initiates performs or supervises the surveillance.

Section 4. Surveillance employees shall also record a summary of the results of the surveillance of any suspicious activity. This summary may be maintained in a separate log.

Section 5. Information entered on the surveillance log must be maintained for at least five (5) years.

IX. REPORTS AND INSPECTIONS.

Section 1. Any reports or other records of the Surveillance Department must be maintained for a minimum period of five (5) years.

Section 2. The Director of OGR&C, or authorized designee, will inspect the surveillance room at least two (2) times a year to ensure:

- A. All equipment is working properly;
- B. No camera views are blocked or distorted by improper lighting or obstructions;
- C. All required surveillance capabilities are in place; and
- D. General compliance with these regulations.

Section 3. GRA Board approved procedures must be implemented for reporting suspected crimes and suspicious activity.

X. DIGITAL SURVEILLANCE SYSTEM STANDARDS.



Mille Lacs Band of Ojibwe Indians
Gaming Regulatory Authority
Detailed Gaming Regulations

SURVEILLANCE

Document No. DGR – 9

Effective: August 30, 2016

Section 1. The digital Surveillance System must:

- A. Dedicated cameras must be recorded at a minimum of 30 images per second (IPS) or frames per second (FPS), in real time.
- B. Produce visual resolution adequate to satisfy the sufficient clarity standards;
- C. Have adequate storage capacity to maintain all images obtained from the video cameras for at least seven (7) days;
- D. Have a failure notification system that provides audible and visual notification of any failure in the Surveillance System. Alternatively, a daily verification of the effective operation of the Surveillance System is acceptable; and
- E. Designed and implemented in a manner that the failure of a single component will be backed up by immediate alternate recording.

Section 2. Access, or the ability to access, a digital Surveillance System from any location outside of the surveillance operations room, must be approved by the GRA. Such transmissions must be effectively encrypted, firewalled on both ends, and password protected.

Section 3. All digital video disks or other storage media produced from the surveillance system must contain the data with the time and date it was recorded superimposed, the media player and the software necessary to view the recorded images, as well as a video verification encryption code (also known as a watermark).

Section 4. In the event of a total surveillance system failure, the Gaming Enterprise and Surveillance Department shall strive to repair or replace the equipment within eight (8) hours of the failure. A system failure in excess of one (1) hour requires notification to the Director of the OGR&C, GRA Board and General Manager to determine alternative additional security measures.

Section 5. All recording equipment must be located in a secured area and the Surveillance Department shall be ultimately responsible for its proper operation and maintenance.

History.

Approved by Band Assembly on November 10, 2005.

Changes approved by the Gaming Regulatory Authority Board on September 11, 2007. Effective Date: September 11, 2007.

Changes approved by the Gaming Regulatory Authority Board on November 4, 2010. Effective Date: November 4, 2010.

Changes approved by the Gaming Regulatory Authority Board on September 1, 2011. Effective Date: September 1, 2011.

Changes approved by the Gaming Regulatory Authority Board on August 30, 2016. Effective Date: August 30, 2016.

Prior versions of this Detailed Gaming Regulation are available upon request from the Gaming Regulatory Authority.