



Mille Lacs Band of Ojibwe Indians
Gaming Regulatory Authority
Office of Gaming Regulation and Compliance

May 5, 2022

**NOTICE OF INTENT
TO ADOPT**

Pursuant to 15 MLBSA § 305(b)(2), this serves as the official Notice of Intent to Adopt the following:

**Changes to:
DETAILED GAMING REGULATION – 22a Surveillance
(Formerly DGR – 9)**

Summary of changes to DGR 22a Surveillance include:

1. New number and easy to read format.
2. Minor increase to number of Slot Progressive cameras will require adding some at each property.
3. Notification timeframes altered.
4. Included standard operating procedure, “Security detentions and investigative interviews shall take place in locations with both video and audio coverage.”

* Note: Numbering changes will be reconciled later; for example, DGR-22a Surveillance will be renumbered to DGR-22 at a future date.

Pursuant to 15 MLBSA § 305(b)(2)(A): Comments may be submitted on the proposed regulation no later than thirty (30) days from the date of the notice. The proposed regulation may be modified if supported by the data and views submitted. Comments may be submitted **no later than 5:00 p.m. on June 4, 2022**, to the Executive Director of the Office of Gaming Regulation & Compliance at **Gaming Regulatory Authority, 777 Lady Luck Drive, Hinckley, MN 55037**, or email to **tkozumplik@mlbgra.com**.



Gaming Regulatory Authority Board

5/5/2022

Date



Mille Lacs Band of Ojibwe Indians

Gaming Regulatory Authority

Detailed Gaming Regulations

DGR- 22a Standards for Surveillance

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1. Surveillance Activity General Standards

- 1.1. All surveillance activities shall be recorded on a log maintained by surveillance associates.
 - 1.1.1. The surveillance log shall be stored securely within the surveillance department.
 - 1.1.2. At a minimum, the following information shall be recorded in a surveillance log:
 - a. Date
 - b. Time commenced and terminated
 - c. Activity observed or performed
 - d. The name or license credential number of each associate who initiates, performs, or supervises the surveillance
- 1.2. Surveillance associates shall record a summary of the results of the surveillance of any suspicious activity.
- 1.3. A system of internal control standards (SICS) shall be developed for surveillance training that shall, at a minimum include the following:
 - 1.3.1. Periodic training shall be provided as defined in the SICS
 - 1.3.2. Training shall include, at minimum, the following:
 - a. Surveillance equipment
 - b. Knowledge of the games
 - c. House rules
 - 1.3.3. Training records shall be maintained.

2. Gaming Enterprise Notifications to Surveillance

- 2.1. Routine gaming floor changes by the Gaming Enterprise with the potential to affect camera coverage shall be reported to Surveillance at a minimum of seven (7) business days prior to taking place.
- 2.2. Renovation/remodeling changes by the Gaming Enterprise with the potential to affect camera coverage shall be reported to Surveillance during the planning phase of the project.

3. Surveillance Room Standards

- 3.1. The surveillance system shall be maintained and operated from a staffed surveillance room and shall provide surveillance over gaming areas.
- 3.2. The entrance to the surveillance room shall be located so that it is not readily accessible by either:
 - 3.2.1. Gaming Enterprise associates who work primarily on the casino floor
 - 3.2.2. General public
- 3.3. The surveillance operation room(s) shall be secured to prevent unauthorized entry.
- 3.4. An access log of authorized associates entering the surveillance operations room shall be maintained and submitted to the GRA Board annually for approval.

- 3.5. The surveillance operations room shall be limited to the following:
 - 3.5.1. Surveillance associates
 - 3.5.2. Other associates authorized in accordance with surveillance department policy approved by the GRA Board.
- 3.6. A list of persons that have entered Surveillance and are not pre-approved shall be prepared and presented to the GRA Board at each regularly scheduled meeting.

4. Surveillance Equipment Standards

- 4.1. The surveillance system shall have the capability to:
 - 4.1.1. Display all camera views on a monitor
 - 4.1.2. Include sufficient numbers of recording devices to record the views of all cameras
 - 4.1.3. Record all camera views
 - 4.1.4. Include sufficient numbers of monitors to simultaneously display gaming and count room activities
 - 4.1.5. Display and record an accurate date and time stamp on recorded events; the displayed date and time must not significantly obstruct the recorded view.
 - 4.1.6. Surveillance room equipment shall have total override capability over all other satellite surveillance equipment.
- 4.2. The surveillance system shall have an auxiliary or backup power source that shall be available and capable of providing immediate restoration of power to the surveillance system to ensure that surveillance associates can observe the following:
 - 4.2.1. Table games remaining open for play
 - 4.2.2. All areas covered by dedicated cameras
- 4.3. In the event of a total system failure, the Surveillance Department shall develop a system of internal control procedures for backup procedures that include, but are not limited to:
 - 4.3.1. Definition of total system failure
 - 4.3.2. Defined time period for immediate notification
 - 4.3.3. Immediate notification to the GRA Board
 - 4.3.4. Immediate notification to the Gaming Enterprise
 - 4.3.5. Immediate implementation of alternative security procedures, such as additional supervisory or security associates posted in areas of dedicated cameras
- 4.4. A periodic inspection, as defined within the SICS, of the surveillance systems shall be conducted.
- 4.5. All surveillance cameras shall be installed in a manner that will prevent it from being readily:
 - 4.5.1. Obstructed
 - 4.5.2. Tampered with

- 4.5.3. Disabled
- 4.6. Each surveillance camera shall possess the capability of having its picture displayed on a monitor and recorded.
- 4.7. Reasonable effort shall be made to repair each malfunction of surveillance system equipment within seventy-two (72) hours after the malfunction is discovered.
 - 4.7.1. The GRA Board shall be notified of any camera(s) that has malfunctioned for more than twenty-four (24) hours.
 - 4.7.2. In the event of a dedicated camera malfunction, the surveillance department shall immediately provide alternative camera coverage.
 - 4.7.3. If alternative camera coverage is not available other security measures shall be deployed by the Gaming Enterprises such as additional supervisory or security associates posted in areas of dedicated cameras.
- 4.8. Surveillance associates shall maintain a log that documents each malfunction and repair of the surveillance system, which includes:
 - 4.8.1. Time
 - 4.8.2. Date
 - 4.8.3. Nature of each malfunction
 - 4.8.4. Efforts expended to repair the malfunction
 - 4.8.5. Date of each effort
 - 4.8.6. Reasons for any delays in repairing the malfunction
 - 4.8.7. Date the malfunction is repaired
 - 4.8.8. Any alternative security measures that were taken, when applicable

5. Surveillance Equipment Security

- 5.1. The Surveillance Department shall develop a system of internal control procedures for the security of surveillance equipment that shall include:
 - 5.1.1. Security over the location of surveillance equipment
 - 5.1.2. Security over physical access to surveillance equipment in each location
- 5.2. Surveillance Equipment shall comply with all system security requirements, including both logical and physical security, as outlined in Detail Gaming Regulation – Information Technology.

6. Surveillance Video Recording and Digital Record Retention Standards

- 6.1. All digital records of coverage provided by the cameras shall be retained for a minimum of seven (7) days.
- 6.2. A video library log shall be maintained to demonstrate compliance with the storage, identification, and retention standards required in this section. Any comparable alternatives to this procedure must be approved by the GRA Board.

- 6.3. Recordings of suspected or confirmed medical incidents, gaming crimes, unlawful activity, detentions by security associates, or suspicious activity must be copied and retained for a time period, not less than five (5) years.
- 6.4. Security detentions and investigative interviews shall take place in locations with both video and audio coverage.

7. Camera Coverage Standards

- 7.1. For bingo, the surveillance system shall monitor and record the following areas and activities with sufficient clarity to record the activities occurring, identify patrons and identify associates:
 - 7.1.1. Bingo hall activities
 - 7.1.2. The bingo ball drawing device or random number generator, which shall be recorded during the course of the draw by a dedicated camera with sufficient clarity to identify the balls drawn or numbers selected
 - 7.1.3. The game board and the activities of the associates responsible for:
 - a. Drawing
 - b. Calling
 - c. Entering the balls drawn or numbers selected
 - 7.1.4. Bingo inventory storage and staging areas
 - 7.1.5. Bingo cage areas, including sufficient clarity to confirm the amount of each cash transaction
- 7.2. For pull tabs, the surveillance system shall monitor and record the following areas and activities with sufficient clarity to record the activities occurring, identify patrons and identify associates:
 - 7.2.1. Pull tab storage area
 - 7.2.2. Pull tab booth activity, including sufficient clarity to confirm the amount of each cash transaction
- 7.3. For card games, the surveillance system shall monitor and record general activities in each card room with sufficient clarity to identify the associates performing the different functions.
 - 7.3.1. Except for card game tournaments, the following shall apply:
 - a. There shall be one (1) pan-tilt-zoom (PTZ) per every two (2) tables.
 - b. Dedicated camera(s) shall be used with sufficient clarity to provide:
 - i. An overview of the activities on each card table surface, including card faces and cash and/or cash equivalents
 - ii. An overview of card game activities, including patrons and dealers
 - iii. An unobstructed view of all posted progressive pool amounts
 - 7.3.2. For card game tournaments, dedicated camera(s) shall provide an overview of:
 - a. Tournament activities
 - b. Any area where cash or cash equivalents are exchanged

- 7.3.3. The surveillance system shall monitor and record progressive card games with a progressive jackpot with the potential to reach \$25,000 or more with dedicated cameras that shall 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 customers and dealer
 - c. A view of the posted jackpot amount
- 7.4. For table games, the surveillance system shall monitor and record each table game with sufficient clarity to record the activities occurring, identify patrons and identify associates.
 - 7.4.1. Coverage for each table game surface shall include sufficient coverage and clarity to simultaneously view the following, which may require multiple cameras of different types:
 - a. Each table bank
 - b. Configuration of wagers
 - c. Card values
 - d. Game outcome
 - 7.4.2. The surveillance system shall monitor and record with dedicated cameras progressive table games with a progressive jackpot with the potential to reach \$25,000 or more with coverage of:
 - a. The table surface with sufficient clarity that the card values and card suits can be clearly identified
 - b. An overall view of the entire table with sufficient clarity to identify customers and dealer
 - c. A view of the progressive meter jackpot amount; if several tables are linked to the same progressive jackpot meter, only one (1) meter needs be recorded
 - 7.4.3. There shall be at a minimum one (1) pan-tilt-zoom camera per two (2) table game tables.
- 7.5. For Class II gaming systems, the surveillance system shall monitor and record the following:
 - 7.5.1. A general overview of activities occurring in wagering account transaction windows and surrounding areas with sufficient clarity to identify associates within and patrons and associates at the counter areas and to confirm the amount of each cash transaction.
 - 7.5.2. All areas where Class II gaming machines can be played or stored with sufficient coverage to provide a general overview of patron and associate activity.
- 7.6. For video games of chance, the surveillance system shall provide for the following:
 - 7.6.1. All areas where VGCs can be played or stored will have camera coverage sufficient to provide a general overview of patron and associate activity.
 - 7.6.2. The surveillance system shall monitor and record video games of chance offering a payout of \$250,000 or more with a dedicated camera(s) to provide coverage of:
 - a. All customers and associates at the gaming machine

- b. The face of the gaming machine, with sufficient clarity to identify the payout line(s) of the gaming machine
- 7.6.3. The surveillance system shall monitor and record in-house progressive video games of chance offering a base payout amount of \$100,000 or more with a dedicated camera(s) to provide coverage of:
 - a. All customers and associates at the gaming machine
 - b. The face of the gaming machine, with sufficient clarity to identify the payout line(s) of the gaming machine
- 7.6.4. The surveillance system shall record wide-area progressive video games of chance offering a base payout amount of \$250,000 or more and monitored by an independent vendor utilizing an on-line progressive computer system with a dedicated camera(s) to provide coverage of:
 - a. All customers and associates at the gaming machine
 - b. The face of the video games of chance, with sufficient clarity to identify the payout line(s) of the gaming machine
- 7.7. For Point-of-Sale terminals, the surveillance system shall provide camera coverage to:
 - 7.7.1. Identify the associate conducting the transaction
 - 7.7.2. Confirm the amount of each cash transaction
- 7.8. For the cage, gaming cashiering areas, main bank, and kiosk area, the surveillance system shall provide for the following:
 - 7.8.1. The surveillance system shall monitor and record a general overview of activities occurring in each cage, gaming cashiering area, main bank and kiosk area with sufficient clarity to:
 - a. Identify associates within the cage
 - b. Identify customers at the counter/window
 - c. Identify associates at the counter/window
 - d. Confirm the amount of each cash transaction
 - e. Identify the chip values
 - f. Identify the amounts on the exchange or transfer slip
 - 7.8.2. The following camera configurations shall apply for cage and gaming cashiering:
 - a. For fills and credits, a dedicated camera or motion activated dedicated camera which provides coverage with sufficient clarity to identify the following for fills and credits:
 - i. Chip values
 - ii. Amounts on the fill/credit slips; controls provided by a computerized exchange and transfer system constitute an adequate alternative to viewing the amounts on the exchange and transfer documentation
 - b. One (1) dedicated overhead camera covering the transaction area for each cashier station with an overview of the following for cash transactions with sufficient clarity to:

- i. Confirm amount of each cash transaction
 - ii. Identify the customer (when applicable)
 - iii. Identify the associates involved with the transaction
 - iv. View the surrounding area of the transaction
- 7.8.3. The surveillance system shall monitor and record a general overview of activities occurring at each kiosk with sufficient clarity to identify the activity and the associates performing the activity, including:
 - a. Maintenance of kiosk
 - b. Kiosk drops
 - c. Kiosk fills
 - d. Redemption of cashless tickets by customers
 - e. Other transactions at the kiosks
- 7.9. For the count room, the surveillance system shall provide for the following:
 - 7.9.1. The surveillance system shall maintain audio capability of the soft count room.
 - 7.9.2. The surveillance systems shall monitor and record with sufficient clarity the following:
 - a. All areas where cash or cash equivalents may be stored or counted, including where currency is:
 - i. Sorted
 - ii. Stacked
 - iii. Counted
 - iv. Verified
 - v. Stored
 - b. The drop box storage rack or area by either a dedicated camera or a motion-detector activated camera
 - c. The soft count room, including:
 - i. All doors to the room
 - ii. All count team associates
 - iii. All drop boxes
 - iv. Safes
 - v. Counting surfaces, which shall be continuously monitored and recorded by a dedicated camera during the soft count
 - vi. Count equipment with sufficient clarity to view any attempted manipulation of the recorded data

History

Approved by Band Assembly on November 10, 2005.

Changes approved by the GRA Board on September 11, 2007. Effective Date: September 11, 2007.

Changes approved by the GRA Board on November 4, 2010. Effective Date: November 4, 2010.

Changes approved by the GRA Board on September 1, 2011. Effective Date: September 1, 2011.

Changes approved by the GRA Board on August 30, 2016. Effective Date: August 30, 2016.

Changes approved by the GRA Board on August 24, 2018. Effective Date: August 24, 2018.

Changes approved by the GRA Board on DATE. Effective Date: DATE.

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

Each Gaming Enterprise shall come into compliance with changes no later than October 1, 2022.