

RESOLUTION 03-22

**A RESOLUTION APPROVING CHANGES TO REGULATION
DGR-22a STANDARDS FOR SURVEILLANCE**

WHEREAS, the Gaming Regulatory Authority Board is the duly-appointed governing body of the Gaming Regulatory Authority, and

WHEREAS, the Gaming Regulatory Authority Board has the power and duty to develop, adopt, and promulgate regulations in accordance with 15 MLBSA §305, and

WHEREAS, the Gaming Regulatory Authority Board has complied with 15 MLBSA §305 (b)(2), DGR-22a Standards for Surveillance was posted for a thirty (30) day comment period beginning May 5, 2022 and closing June 4, 2022, and

WHEREAS, the Gaming Regulatory Authority Board received comments during the posted comment period and in accordance with 15 MLBSA §305 (b)(3) has reviewed all comments and has made such changes to DGR-22a Standards for Surveillance as it deemed reasonable and appropriate.

NOW, THEREFORE IT IS RESOLVED that the Gaming Regulatory Authority Board approves changes to DGR-22a Standards for Surveillance.

WE DO HEREBY CERTIFY, that the foregoing resolution was duly concurred with and adopted at a regular meeting of the Gaming Regulatory Authority Board, a quorum of members being present, held on the 23rd day of June 2022 by a vote of 3 FOR, 0 AGAINST, 0 SILENT.

IN WITNESS WHEREOF, we the Gaming Regulatory Authority Board hereunto cause to have set the signature of the Gaming Regulatory Authority Chairperson to be affixed to this Resolution.





Gaming Regulatory Authority Board Chairperson



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

June 23, 2022

NOTICE OF ADOPTION

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

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

Summary of changes, minor edits to DGR 22a Surveillance include:

1. Reformatting from two columns to one column.
2. Punctuation and grammar corrections.
3. Updating/adding contact information.

Pursuant to 15 MLBSA § 305(b)(3): The GRA reviewed the comments received during the comment period, beginning May 5, 2022, and closing June 4, 2022. The GRA hereby responds a comment below and makes changes as applicable.

Comment 1: Surveillance Log server not located in Surveillance (1.1.1), changed to:

- The surveillance log shall be stored securely.

Comment 2: DGR does not mention supervision standards found in the MICS.

- Supervision Standards added.

Comment 3: Surveillance employees are not "Associates". Associates implies an employee of MLCV or Grand Casino.

- Associates will remain for consistency throughout the DGR's.

Comment 4: Are members of the Surveillance Department the only employees with access to the log? How is this demonstrated?

- Surveillance SICs will address this question.

Comment 5: We note that this is required by 15 MLBSA 306(d). Title 15 contemplates that the GRA will adopt a DGR further defining the scope of the Gaming Enterprises' access rights. MLCV would welcome the opportunity to discuss the parameters of its camera access rights with the GRA for inclusion in this DGR.

- Gaming Enterprise access added: electronic surveillance output as approved by the GRA Board.
- Signed Confidentiality and Ethical Use of CCTV form required, and violations of forms may result in temporary suspension of electronic surveillance output.

Comment 6: How will the gaming enterprise know if floor changes have a potential to affect camera coverage when camera locations are not shared with the property?

- Camera coverage required in within this regulation; other required coverage is defined in Contracts or agreements and the department involved is aware of these requirements.

Comment 7: This section does not mention video output being accessible to Grand Casino for management purposes. This is a major change that we do not agree with and was not mentioned in the Notice of Intent to Adopt.

- Providing access to the room and output are not one in the same. Control and Supervision of the room is through the Authority, we are not required to supply access to the room. We will provide access as listed.

Comment 8: How does an Associate of Grand Casino become authorized throughout the year?

- This is addressed in Surveillance SICs.

Comment 9: Will this policy be co-authored with members from property management for access to view video output?

- The Surveillance department will author the policy.

Comment 10: What happens in the event of emergency or inspection by property? Recommend unlimited access to the surveillance operations room by Security and the Crisis Management Response Team when the Crisis Management Response Team is activated in the event of an emergency.

- See Access List for further details.

Comment 11: Satellite surveillance equipment is not mentioned anywhere else in this DGR and is not defined. A definition is needed for clarity.

- Addressed.

Comment 12: What happens in the event of a partial system failure?

- This is addressed in the Surveillance SICs

Comment 13: Will these procedures be co-authored and shared with Gaming Enterprise management e.g., crisis response team?

- Surveillance will author their SICs.

Comment 14: This should be a last resort. Other measures can be taken such as closing a table or cashier window depending on the camera failure.

- Agreed, these are only examples and is almost verbatim from MICS.

Comment 15: Will inspections of the equipment be shared with Casino Management? What is inspected and purpose. Specific electrical, fire code, and safety should be inspected.

- Surveillance participates in the yearly third-party inspections and fire extinguisher inspections several times a year, many of which Operations arranges for and get results of.

Comment 16: Already covered in 4.1.1 & 4.1.3?

- Agreed and addressed

Comment 17: How will the gaming enterprise know when a camera has been malfunctioning if only the GRA Board is notified if this is not a total system failure that requires notification to the gaming enterprise. How will the gaming enterprise know if equipment has been malfunctioning for more than 24hrs? How will the gaming enterprise know if equipment has been repaired within 72 hrs?

- Addressed in Surveillance SICs.

Comment 18: Is this information shared with the Security and Information Technology departments?

- Addressed in Surveillance SICs.

Comments 19 and 20: Security detentions may not always have the ability or option to move to a place with audio for de-escalation purposes. We feel this is operational not regulatory.

- Disagree, this is for the safety of the Gaming Enterprise and its associates. We will keep this language as they can be licensing affecting or related to criminal activity.

Comment 21: Sufficient clarity should be defined in this DGR.

- Sufficient clarity is defined in the Definitions regulation.

Effective Date: June 23, 2022.

The GRA attached the final version illustrating the updates made as a result of reviewing the comments submitted. Copies of this regulation can be obtained at the GRA Office of Gaming Regulation & Compliance and at <https://millelacsband.com/home/indian-gaming-regulation/gaming-regulations-resolutions>



Gaming Regulatory Authority Board

6/23/2022

Date



Mille Lacs Band of Ojibwe Indians

Gaming Regulatory Authority

Detailed Gaming Regulations

DGR-22a Standards for Surveillance

Table of Contents

1. Surveillance Activity General Standards	3
2. Gaming Enterprise Notifications to Surveillance	3
3. Surveillance Room Standards	3
4. Surveillance Equipment Standards	4
5. Surveillance Equipment Security.....	5
6. Surveillance Video Recording and Digital Record Retention Standards	6
7. Camera Coverage Standards.....	6

1. Surveillance Activity General Standards

- 1.1. Supervision must be provided as needed for surveillance by an agent(s) with authority equal to or greater than those being supervised.
- 1.2. All surveillance activities shall be recorded on a log maintained by surveillance associates.
 - 1.2.1. The surveillance log shall be stored securely.
 - 1.2.2. 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
- 1.3. Surveillance associate shall record a summary of the results of the surveillance of any suspicious activity.
- 1.4. A system of internal control standards (SICS) shall be developed for surveillance training that shall, at a minimum include the following:
 - 1.4.1. Periodic training shall be provided as defined in the SICS
 - 1.4.2. Training shall include, at minimum, the following:
 - a. Surveillance equipment
 - b. Knowledge of the games
 - c. House rules
 - 1.4.3. Training records shall be maintained.
- 1.5. The GRA shall give the Gaming Enterprises access to electronic surveillance output as approved by the GRA Board.
 - 1.5.1. All associates with access to surveillance output must have signed Confidentiality and Ethical Use of CCTV Cameras, Equipment, Recording and Data Agreement Forms on file with the GRA.
 - 1.5.2. For violations of the Confidentiality and Ethical Use of CCTV Cameras, Equipment, Recording and Data Agreement Forms violations, the GRA Board reserves the right to temporarily suspend access to electronic surveillance output.

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 employees
 - 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, includes any office with surveillance output or equipment room. This includes any space with electronic surveillance output.
- 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 employees 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. Reasonable effort shall be made to repair each malfunction of surveillance system equipment within seventy-two (72) hours after the malfunction is discovered.
 - 4.6.1. The GRA Board shall be notified of any camera(s) that has malfunctioned for more than twenty-four (24) hours.
 - 4.6.2. In the event of a dedicated camera malfunction, the surveillance department shall immediately provide alternative camera coverage.
 - 4.6.3. 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.
- 4.7. Surveillance employees shall maintain a log that documents each malfunction and repair of the surveillance system, which includes:
 - 4.7.1. Time
 - 4.7.2. Date
 - 4.7.3. Nature of each malfunction
 - 4.7.4. Efforts expended to repair the malfunction
 - 4.7.5. Date of each effort
 - 4.7.6. Reasons for any delays in repairing the malfunction
 - 4.7.7. Date the malfunction is repaired
 - 4.7.8. 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 (capacity to record images at a minimum of 20 frames per second or equivalent recording speed and at a resolution sufficient to clearly identify the intended activity, person, object or location) 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, vault, 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, vault, 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 June 23, 2022. Effective Date: June 23, 2022.

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.