



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

**SURVEILLANCE**

**Document No. DGR – 9**

**Effective: November 4, 2010**

**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 shall be maintained and operated from a staffed surveillance room and shall provide surveillance over any Mille Lacs Band owned gaming entity. Surveillance room staff shall be comprised of employees of the Gaming Regulatory Authority under the day to day supervision of the Director of Surveillance.
- B. The entrance to the surveillance operations room shall be appropriately secured to prevent unauthorized access.
- C. Access to the surveillance operations room shall be limited to surveillance personnel, designated employees, and other persons authorized. A list of authorized individuals who maybe admitted to the surveillance operations room shall be approved by the GRA Board annually. The surveillance department shall maintain a sign-in log of other authorized persons entering the surveillance room. Individuals not included on the list of approved individuals will only be allowed in the surveillance room with approval of the Executive Director of OGR&C, Assistant Director of OGR&C, Director of Surveillance or designee. The Executive Director of OGR&C or designee shall notify the GRA Board at or before its next regularly scheduled Board meeting if an individual is admitted to the surveillance room under the preceding sentence.
- D. The Surveillance Department shall be under the control and supervision of the Gaming Regulatory Authority; however, each Gaming enterprise shall have access to electronic surveillance output for management purposes. The list of management personnel who may be admitted to the surveillance viewing room shall be approved by the GRA Board annually.
- 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, etc.
- F. Unless acting as a representative of the GRA, no one shall clean, operate, obstruct the view of or tamper with any Surveillance Equipment without prior consent of the Executive Director of OGR&C, Assistant Director of OGR&C, the Surveillance Director or designee.
- G. Persons whose employment with the Surveillance Department ends for any reason shall not be eligible for employment in a money-handling key position within the Gaming Enterprise they were employed at for a minimum period of one year after such termination or end of employment.
- H. Persons whose employment with the Surveillance Department ends for any reason shall be excluded from participating in Class II and Class III gaming at any Mille Lacs Band gaming entity for a period of six (6) months from the date of separation from employment.
- I. Surveillance operations room equipment shall have total override capability over all other satellite surveillance equipment located outside the surveillance operations room.
- J. In the event of power loss to the surveillance system, an auxiliary or backup power source shall be available and capable of providing immediate restoration of power to all elements of the surveillance system that enable surveillance personnel to observe all areas mandated by



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- 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 secondary power supplies, such as generators, that are controlled by the Property shall be maintained and put in to operation when circumstances call for it.
- K. The surveillance system shall include date and time generators that possess the capability to display the date and time of recorded events on video and/or digital recordings. The displayed date and time shall not significantly obstruct the recorded view.
  - L. The surveillance operations room shall be staffed at all times by personnel trained in the use of the equipment, knowledge of the games and house rules.
  - M. Each camera required by the standards in this section shall be installed in a manner that will prevent it from being readily obstructed, tampered with, or disabled by customers or employees.
  - N. Each camera required by the standards in this section shall possess the capability of having its picture displayed on a monitor and recorded. The surveillance system shall include sufficient numbers of monitors and recorders to simultaneously display and shall record multiple gaming and count room activities, and record the views of all dedicated cameras and motion activated dedicated cameras.
  - O. Reasonable effort shall be made to repair each malfunction of surveillance system equipment required by the standards in this section within seventy-two (72) hours after the malfunction is discovered.
    - 1. In the event of a dedicated camera malfunction, or software communication malfunction, the gaming operation and/or the surveillance department shall immediately provide alternative camera coverage or other security measures, such as additional supervisory or security personnel, to protect the subject activity.
    - 2. The GRA Board shall be notified of any camera(s) mandated by the standards established in this regulation that has malfunctioned for more than twenty-four (24) hours.
  - P. Components for every table using digital facsimile cards shall be secured in a locked area. Any access to the area shall be recorded as well as the date and time of each access. Additionally, the device shall notify the house of any access to the device. Any access to the device shall be investigated with a report to the event, the cause of the warning, dealer identity, and the resolution of the problem. Such reports shall be available for inspection by the Minnesota Department of Public Safety, Alcohol & Gambling Enforcement Division.

**II. REQUIREMENTS WITH RESPECT TO SPECIFIC GAMES AND GAMING MACHINES.**

**Section 1. Bingo.**

- A. The surveillance system shall possess the capability to monitor 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.
- B. The surveillance system shall monitor and record the game board and the activities of the employees responsible for drawing, calling, and entering the balls drawn or numbers selected.

**Section 2. Card Games.** The surveillance system shall monitor and record general activities in each card room with sufficient clarity to view customers, dealers and activities on the card table surfaces.



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**Section 3. Table Games.** Operations with three (3) or more table games shall monitor and record the following:

- A. Each table game area with sufficient clarity to identify customers and dealers; and
  - 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 4. Progressive Table Games.** Each progressive table games with a progressive jackpot of \$25,000 or more shall 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 customers 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 5. Gaming Machines.**

- A. Gaming machines offering a payout of more than \$250,000 (excluding bonus rounds) shall be monitored and recorded by a dedicated camera(s) to provide coverage of:
  - 1. All customers and employees at the gaming machine, and
  - 2. The face of the gaming machine, with sufficient clarity to identify the payout line(s) of the gaming machine.
  - 3. The coverage required above does not require one dedicated camera per gaming machine if one dedicated cameras is able to provide the required coverage for more than one gaming machine.
- B. In-house progressive machine. In-house progressive gaming machines offering a base payout amount (jackpot reset amount) of more than \$100,000 shall be monitored and recorded by a dedicated camera(s) to provide coverage of:
  - 1. All customers and employees at the gaming machine; and
  - 2. The face of the gaming machine, with sufficient clarity to identify the payout line(s) of the gaming machine.
  - 3. The coverage required above does not require one dedicated camera per gaming machine if one dedicated cameras is able to provide the required coverage for more than one gaming machine.
- C. Wide-area progressive machine. Wide-area progressive gaming machines offering a base payout amount of more than \$250,000 and monitored by an independent vendor utilizing an on-line progressive computer system shall be monitored and recorded by a dedicated camera(s) to provide coverage of:
  - 1. All customers and employees at the gaming machine; and
  - 2. The face of the gaming machine, with sufficient clarity to identify the payout line(s) of the gaming machine.
  - 3. The coverage required above does not require one dedicated camera per gaming machine if one dedicated cameras is able to provide the required coverage for more than one gaming machine.

**III. CAGE AND VAULT.**

**Section 1.** The surveillance system shall monitor and record a general overview of activities occurring in each cage and vault area with sufficient clarity to identify employees within the cage



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and customers and employees at the counter areas and to confirm the amount of each cash transaction occurring between employees and between employees and customers.

**Section 2.** Each cashier station shall 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 shall 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.

**IV. Count Rooms.**

**Section 1. Hard Count.** The surveillance system shall monitor and record with sufficient clarity all areas where coin may be stored or counted, and shall include the following:

- A. Hard count room including all doors to the hard count room, all scales and wrapping machines and all areas where uncounted coin may be stored during the drop and count process and all count team personnel.
- B. Coverage of scales of sufficient clarity to view any attempted manipulation of the recorded data.

**Section 2. Soft Count.** The surveillance system shall monitor and record with sufficient clarity all areas where currency may be stored or counted, and shall 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 personnel.
- B. The counting surface area must be continuously monitored/displayed and recorded by a dedicated camera during the soft count.
- C. The drop box storage rack or area by either a dedicated camera or a motion-activated dedicated camera.
- 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/OR DIGITAL RECORD RETENTION.**

**Section 1.** All video recordings and/or digital records of coverage provided by dedicated cameras or motion-activated dedicated cameras required by the standards in this section shall be retained for a minimum of fourteen (14) days.

**Section 2.** Recordings involving suspected or confirmed gaming crimes, unlawful activity, or detentions by security personnel, must be retained for a minimum of thirty (30) days.

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

**VI. VIDEO LIBRARY LOG.** A video library log, or comparable alternative procedure approved by the GRA Board, shall be maintained to demonstrate compliance with the storage, identification, and retention standards required in this regulation.



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**VII. MALFUNCTION AND REPAIR LOG.**

**Section 1.** Surveillance personnel 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 shall 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 shall be maintained for a minimum period of five (5) years.

**VIII. SURVEILLANCE LOG.**

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

**Section 2.** Such log shall be maintained by surveillance operation room personnel and shall be stored securely within the Surveillance department.

**Section 3.** 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; and
- D. The name or license credential number of each person who initiates, performs, or supervises the surveillance.

**Section 4.** Surveillance personnel 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 should be maintained for a minimum period of five (5) years.

**IX. REPORTS AND INSPECTIONS.**

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

**Section 2.** The Executive Director of OGR&C, or authorized designee, will inspect the surveillance room at least, but not limited to two (2) times a year or semi annually 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.

**X. Digital Surveillance System Standards.**

**Section 1.** The digital Surveillance equipment used to satisfy the standards in the Section shall:



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- A. Record and play back video at a minimum of 30 frames per second (FPS), full screen (4 common intermediate format CIF), in real time.
  - B. Produce visual resolution that is adequate to satisfy the sufficient clarity standards in this Section.
  - C. Have adequate storage capacity to maintain for a period of not less than fourteen (14) days, all images obtained from the video cameras.
  - D. Have a failure notification system that provides audible and visual notification of any failure in the surveillance system or the Digital Video Recording (DVR) media storage system. Alternatively, a daily verification of the effective operation of the surveillance system and DVR media storage system components is acceptable.
  - E. Have a media storage system that is configured so that a failure of any single component will result in no loss of data from the media storage system.

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

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

**Section 4.** In the event of a failure of a DVR storage media system (total system failure), the gaming operation should strive to repair or replace the equipment within 8 hours of the failure.

**Section 5.** All DVR 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 the Gaming Regulatory Authority Board on November 4, 2010. **Effective Date November 4, 2010.**

Change to V sec. 2: Deleted: "but no longer than a period of five (5) years" approved by the Gaming Regulatory Authority Board on September 1, 2011. **Effective Date of changes September 1, 2011.**