

**SECTION 18 23**  
**SURVEILLANCE SURVEILLANCE**

**23.1 Definitions**

Definitions used in previous and subsequent sections retain their meaning unless modified below:

**Component Failure** – any equipment malfunction (e.g., server, switch, cameras, monitors) that renders surveillance operations incapable of monitoring and/or recording required camera coverage.

**Surveillance Operations Room** – a secure location(s) in a gaming operation used primarily for casino surveillance.

**Surveillance System** – a system of video cameras, monitors, recorders, video printers, switches, selectors, and other ancillary equipment used for casino surveillance.

**23.2 General**

A. The purpose of ~~the~~ surveillance ~~system~~ is to assist the operations and Cherokee Nation Gaming Commission (CNGC):

1. ~~In-safeguarding~~ To safeguard the operations assets;
2. ~~In-deterring~~ To deter, ~~detecting~~ detect and ~~prosecuting~~ prosecute criminal acts; and,
3. ~~In—maintaining~~ To maintain public confidence and trust that activities in a licensed gaming facility are conducted honestly and free of criminal elements and activity.

B. Surveillance Staffing

1. Tier A - operations that do not offer table or card games must, at a minimum, maintain and operate an unstaffed surveillance system in a secured location with procedures approved by the CNGC, whereby the areas under surveillance are continually recorded and monitored/reviewed periodically. Alternative controls must be defined for camera coverage that cannot conform to the camera coverage standards required by this Section.
2. For Tier B and C, the surveillance ~~monitor~~ operations room must be staffed and the surveillance equipment monitored at all times by trained surveillance personnel. Surveillance and/or gaming facility management are required to provide a staffing plan, subject to CNGC approval, that provides for sufficient personnel to cover the activities being recorded / ensure effective casino surveillance. Any amendments to the approved staffing plan must be authorized by the CNGC prior to implementation.
3. No current or former Surveillance employee shall accept employment within another department within the casino in which he/she is or was previously employed unless one (1) year has passed since the former surveillance employee worked in the surveillance room. Notwithstanding the foregoing, the CNGC may, upon the filing of a written petition by the

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employee and/or gaming facility management, waive this restriction and permit the employment of a current or former surveillance employee in a particular position after consideration of the following factors;

- a. Whether the former surveillance employee will be employed in a department or area of operation that the surveillance department does not monitor;
- b. Whether the surveillance and security systems of the gaming facility will not be jeopardized or compromised by the employment of the former surveillance employee in the particular position; and,
- c. Whether the former surveillance employee's knowledge of the procedures of the surveillance department would not facilitate the commission by any person of irregularities or illegal acts and/or the concealment of any such actions or errors.

**C. Location**

The entrance to the surveillance operations room shall be located so that it is not readily accessible by unauthorized employees or the general public.

**D. Access**

1. Access to the surveillance operations room shall be restricted to members of the Surveillance Department, designated employees, and other persons authorized in accordance with the Surveillance department policy, which shall be approved by the CNGC.

a. Persons authorized to enter the surveillance operations room without escort shall be listed by title. The Surveillance Department is responsible to update the list and provide the list to the CNGC every thirty (30) days. The monthly report shall consist of no less than the title of authorized persons and a statement indicating any changes or no changes from the previous report which was submitted to the CNGC.

b. Any person entering the surveillance operations room without specific authorization/access, must be escorted to the surveillance operations entrance by Security an employee with specific authorization/access and shall sign an entry access log that designates the date/time, duration, and purpose of the visit, and the initials and employee number of the escort.

2. For any workstation/surveillance monitor located outside of the

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surveillance operations room access shall be highly restricted and must adhere to the location and access controls required by this Section.

3. Access, or the ability to access, the surveillance system from any location outside of the surveillance operation room, shall be approved by the CNGC. Such transmissions shall be effectively encrypted and password protected.
4. ~~For access controlled by a computerized system the access control administrator shall assign and control user access into the surveillance operations room to ensure access is restricted to authorized employees only.~~
5. ~~The operation, as approved by the CNGC, shall establish procedures for reviewing access and reporting unauthorized access. Access control personnel shall review, at least quarterly, a sample of users that are assigned access to the surveillance operations room for proper authorization and assurance.~~
6. ~~All noted unauthorized access shall be investigated with the results documented and submitted to the CNGC.~~

E. Training

1. The Surveillance department shall ~~strive to~~ ensure staff is trained in the use of the equipment, knowledge of the

games, house rules, and internal controls. Surveillance operations staff must possess a valid gaming license.

2. Surveillance system technicians shall be adequately trained on the technical aspects of the system and the internal controls specific to system requirements. Only licensed, trained technicians and/or authorized vendors (with appropriate ID) shall be authorized to maintain or repair the surveillance system or its components.
3. The Surveillance department shall immediately notify the CNGC of discovery of any violation or suspected violation of any criminal statute.

**23.3 Equipment**

A. **Lighting**                      **Clarity/Visibility**  
Requirements

1. Adequate lighting is required in all areas where camera coverage is required. The lighting shall be of sufficient intensity to produce clear video recording and still picture production, and correct color correction (e.g. video output must demonstrate a clear picture, identifying the pips on chips, and the color and marking on cards, in existing light under normal operating conditions).
2. Color camera recordings are required in all areas unless otherwise approved by CNGC.

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3. For analog recordings / systems, no recorder shall have a recording interval of less than twenty (20) Frames Per Second (FPS).
4. Digital video recording (DVR) systems shall be ~~are required to be utilized which are~~ capable of storage and playback of images at thirty (30) ~~images~~ Frames Per Second (FPS), ~~for each camera at full screen~~ (4 Common Intermediate Format (CIF)), in real time resolution for all areas where gaming is conducted and where currency, coin and equivalents are counted, stored, accessed and transacted.
5. For all other camera recordings required by this Section, a recording rate of not less than fifteen (15) FPS shall be required.
6. All cameras required by this Section shall produce visual resolution that is adequate to satisfy the sufficient clarity/visibility standards specified.
  - ~~A. ensuring the video compression technology used shall not cause any degradation of the images recorded~~
  - ~~B. All DVR equipment and systems shall have:
    - a. A failure notification system that provides an audible, as well as a visual notification of any failure in the~~

- ~~surveillance system or the DVR media storage system;~~
- ~~b. A media storage system failover configured with full redundancy so that a failure of any single component will not result in the loss of any data~~
- ~~e. Simultaneous playback and live viewing while recording live images; and,~~
- ~~d. On any storage media produced from the system, the time and date it was recorded superimposed thereon, the media player software necessary to view the images, and a video verification encryption code (watermark).~~

B. For Tier A the following equipment standards shall apply:

1. 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.
2. 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~~ patrons or ~~staff employees~~.

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3. Each camera required by the standards in this Section shall possess the capability of having its picture recorded. The surveillance system shall include sufficient numbers of recorders to simultaneously record multiple gaming and count room activities, and record the views of all dedicated cameras and motion activated dedicated cameras.

~~A. Any malfunction of surveillance equipment shall necessitate the immediate replacement of the faulty unit with a working unit. If immediate replacement is not possible, alternative live monitoring must be provided by casino surveillance personnel. The live monitoring must meet the approval of the CNGC agent and/or designated CNGC management personnel in order for gaming/transactions to continue in the affected surveillance area. If the CNGC agent or management personnel deem the live monitoring by casino surveillance personnel to be inadequate, activity in that area shall cease until the provision of adequate monitoring is met.~~

~~B. In the event of a dedicated camera malfunction, the operation and/or the Surveillance department shall immediately, upon identification of the malfunction, suspend activity, provide alternative camera coverage or other security measures, such as additional supervisory or security~~

~~personnel, to protect the subject activity.~~

~~C. Reasonable effort shall be made to repair each malfunction of the surveillance system and/or equipment required by the standards in this Section within seventy-two (72) hours after the malfunction is discovered. The CNGC shall be notified of any camera(s) that has malfunctioned for more than twenty four (24) hours.~~

~~D. Surveillance personnel shall maintain a log or alternative procedure approved by the CNGC that documents each malfunction and repair of the surveillance system as defined in this Section.~~

~~E. The log shall state the time, date, and nature of each malfunction; the efforts expended to repair the malfunction, and the date of each effort, the reasons for any delays in repairing the malfunction, the date the malfunction is repaired, and where applicable, any alternative security measures that were taken.~~

C. For Tier B – in addition to Tier A standards listed above, the following shall apply:

1. The Surveillance room equipment shall have total override capability over all other satellite surveillance equipment located outside the surveillance **operation** room.

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2. 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 number 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.

D. For Tier C – The surveillance standards for Tier A and B shall apply with the inclusion of the following: 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 the table games remaining open for play and all areas covered by dedicated cameras. Auxiliary or backup power sources such as a UPS System used in conjunction with a backup generator, or an alternate utility supplier, will satisfy this requirement.

#### **23.4 Surveillance Plan**

- A. Each gaming facility shall submit a surveillance system plan to the CNGC for approval.
- B. Any and all changes and/or modifications to the surveillance system plan, the surveillance system or any components must be approved

by the CNGC prior to implementation.

- C. Each gaming facility shall have surveillance equipment (i.e. monitor and camera control unit) located within the on-site CNGC offices.
- D. The surveillance system plan must include a casino floor plan that shows the placement of all surveillance equipment in relation to the locations required by this Section (CNGC regulations and/or minimum internal controls) to be covered and a detailed description of the procedures utilized in the operation of the casino surveillance systems and its equipment. In addition, the plan may include other information, such as a preventative maintenance plan, that evidences compliance with this standard and all other surveillance policies and procedures requiring CNGC approval.
- E. If, after reviewing the written casino surveillance system plan, the CNGC determines the plan does not comply with the standards in this Section, the CNGC shall notify the licensee in writing, and the plan must be revised to comply with the standards of this Section and submit the revised plan within thirty (30) days after receipt of the CNGC's written notice. Final approval of the surveillance plan will be made only after a test of the system and verification of compliance.
- F. Gaming facility management may not change the lighting, locations of table games, gaming machines, card games, or other gaming devices

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without the approval of the CNGC. The surveillance system and/or plan must also be adjusted, if necessary, to provide coverage required by this Section.

G. In addition to any other recording requirements that are or may be imposed by this Section, surveillance shall record all views, activities, and locations as the CNGC Director or his/her designee may require from time to time. Such recordings shall be communicated only to the Director or his/her designee, unless otherwise provided.

H. Surveillance and/or gaming facility management shall submit for approval by the CNGC a written listing of those persons/vendors authorized to access and/or service the surveillance system and/or its components/equipment. Any changes to this list must first receive approval from the CNGC prior to implementation.

### 23.5 Surveillance Activity Logs

A. Any system used to track or monitor surveillance shall be approved by the CNGC, and CNGC shall be granted full access to any surveillance system immediately upon request.

B. Surveillance personnel shall maintain a log of all surveillance activities.

C. Such log shall be maintained by Surveillance **operation** room personnel and shall be stored securely within the Surveillance department and shall be made

available to CNGC immediately upon request.

D. At a minimum, the following information shall be recorded in a surveillance log:

1. Date;
2. Time commenced and terminated;
3. Activity observed or performed; and,
4. The name or license credential number of each person who initiates, performs, or supervises the surveillance.

E. Surveillance personnel shall also record a summary of the results of the surveillance of **internal control violation and/or** any suspicious activity. This summary may be maintained in a separate log and submitted to the CNGC on a weekly basis.

F. Where ever surveillance notice is required by this document prior to commencing an activity, acknowledgement shall be provided prior to activity and notice shall be adequately documented.

G. **The log must be retained for a minimum of one (1) year after the date of the last entry in it.**

### 23.6 Malfunction and Repair

A. **Malfunction and Repair Log**

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1. Surveillance personnel shall maintain a log or alternative procedure approved by the CNGC that documents each malfunction and repair of the surveillance system as defined in this Section.
  2. The log shall state the time, date, and nature of each malfunction, the efforts expended to repair the malfunction, and the date of each effort, the reasons for any delays in repairing the malfunction, the date the malfunction is repaired, and where applicable, any alternative camera coverage and/or security measures that were taken or activity was suspended.
  3. The log must be retained for a minimum of one (1) year after the last entry in it.
- B. In the event of a dedicated camera malfunction, the operation and/or the Surveillance department shall immediately, upon identification of the malfunction, provide alternative camera coverage or other security measures, such as additional supervisory or security personnel, to protect the subject activity.
- C. Reasonable effort shall be made to repair any dedicated camera malfunction required by the standards in this Section within seventy-two (72) hours after the malfunction is discovered. The CNGC shall be notified of any camera(s) that has malfunctioned for more than twenty-four (24) hours.
- D. The surveillance plan shall provide sufficient redundancy and spare parts to ensure the surveillance system remains operational in the event of a component failure.
- E. Any component failure shall necessitate the immediate repair/replacement of the faulty unit, alternate camera coverage or suspend activity, and immediate notification to the CNGC. Repair or replacement of the equipment causing the component failure must be performed within four (4) hours from the audio and/or visual notification or upon identification of the failure. The CNGC may suspend activity if the malfunction cannot be repaired within a time frame suitable for the area being covered.
- F. In addition, any component failure that results in loss of coverage over any highly restricted areas shall require alternate live monitoring coverage by Security personnel.
- ~~G. Any malfunction of surveillance equipment shall necessitate the immediate replacement of the faulty unit with a working unit. If immediate replacement is not possible, alternative live monitoring must be provided by casino surveillance personnel. The live monitoring must meet the approval of the CNGC agent and/or designated CNGC management personnel in order for gaming/transactions to continue in the affected surveillance area. If the CNGC agent or management personnel deem the live monitoring by casino surveillance personnel to~~

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~~be inadequate, activity in that area shall cease until the provision of adequate monitoring is met.~~

~~H. In the event of a dedicated camera malfunction, the operation and/or the Surveillance department shall immediately, upon identification of the malfunction, suspend activity, provide alternative camera coverage or other security measures, such as additional supervisory or security personnel, to protect the subject activity.~~

~~I. Reasonable effort shall be made to repair each malfunction of the surveillance system and/or equipment required by the standards in this Section within seventy two (72) hours after the malfunction is discovered. The CNGC shall be notified of any camera(s) that has malfunctioned for more than twenty-four (24) hours.~~

~~J. Surveillance personnel shall maintain a log or alternative procedure approved by the CNGC that documents each malfunction and repair of the surveillance system as defined in this Section.~~

~~K. The log shall state the time, date, and nature of each malfunction, the efforts expended to repair the malfunction, and the date of each effort, the reasons for any delays in repairing the malfunction, the date the malfunction is repaired, and where applicable, any alternative security measures that were taken.~~

### 23.7 Maintenance and Testing

- A. At various times, all surveillance equipment shall be subject to unannounced testing of minimum standards of resolution and operation by the CNGC or its designee.
- B. Upon completion of the testing, CNGC personnel shall meet with surveillance and gaming facility management to ascertain the approximate time needed to make necessary repairs and determine whether gaming may continue with live monitoring as required in Section ~~23.2(B)(7)~~ 23.6(B).
- C. All systems that display date and time:
  1. Shall be synchronized within plus or minus five (5) minutes of the surveillance system;
  2. Shall be synchronized or verified on a quarterly basis; and
  3. Any system or system failure shall be synchronized and verified.

### 23.8 Video/Digital Records and Retention

- A. Video surveillance and as required audio surveillance, at a minimum, must be retained pursuant to the following:
  1. Gaming Areas – Thirty (30) days.
  2. Card/Table Games – Fourteen (14) days.
  3. Cage/Main Vault – Thirty (30) days.

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4. Security Offices – Thirty (30) days
  5. Non-Gaming Areas – Fourteen (14) days
  6. Gaming Facility Exterior – Fourteen (14) days
- B. A video library log, or comparable alternative procedure approved by the CNGC, shall be maintained to demonstrate compliance with the storage, identification, and retention standards required in this Section.
- C. Recordings involving suspected or confirmed gaming crimes, unlawful activity, or detentions by security personnel, must be retained for a minimum of thirty (30) days and until investigation is concluded.
- D. Video files maintained for evidentiary purposes shall be adequately safeguarded and logged with the date and time it was recorded, the name of the individual who recorded it, the name and title/agency of the person receiving the file and the date and time file was released.
- E. Duly authenticated copies of video recordings and/or digital records shall be provided to the CNGC upon request.
- F. Any video requests made by the CNGC shall be kept confidential and not be included on any distributed activity logs.

**23.9 Security**

Effective Date 01/11/2012

The surveillance system must cover all areas of any security office where any person(s) may be detained, questioned, interviewed or interrogated by casino security officers. Security office coverage must include both audio and video, be recorded at all times that a person(s) is/are detained, questioned, interviewed or interrogated in the area, and the signal must terminate in the security room. In each office or room covered by this Section, a sign must be conspicuously displayed which states that the area is under constant audio and video surveillance.

**23.10 Bingo/Pulltabs**

- 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 drawing 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.
- C. Pull Tabs
  1. The sale of pull tabs at a Point of Sale (POS) and/or vending machine shall follow standards out lined in Section 23.14 23.17.
  2. Pull tabs and/or similar inventory shall be monitored in accordance with Section 23.18 23.21.

**23.11 Gaming Machines**

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A. Except as otherwise provided in paragraphs ~~23.9~~ 23.11 (B) and ~~23.9~~ 23.11 (C) of this Section, any gaming machines offering a payout of more than Two Hundred and Fifty Thousand Dollars (\$250,000.00) or those with a minimum wager of Twenty-five Dollars (\$25.00) or more shall be monitored and recorded by a dedicated camera(s) to provide coverage of:

1. All guests 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.

B. In-house progressive gaming machines offering a base payout amount (jackpot reset amount) of One Hundred Thousand Dollars (\$100,000.00) or more shall be recorded by a dedicated camera(s) to provide coverage of:

1. All guests 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.

C. Wide-area progressive:

1. Wide-area progressive gaming machines offering a base payout amount of One Million Dollars (\$1,000,000.00) or more and monitored by an independent vendor utilizing an on-line

progressive computer system shall be recorded by a dedicated camera(s) to provide coverage of:

- a. All customers and employees at the gaming machine; and,
- b. The face of the gaming machine, with sufficient clarity to identify the payout line(s) of the gaming machine.

2. Any standards a vendor may require must be submitted to CNGC for review and approval, prior to installation.

D. For linked/grouped gaming machines utilized for tournament offerings, the surveillance system shall provide at a minimum one (1) pan, tilt, and zoom (PTZ) camera with sufficient clarity to identify all customer and employee activities at the gaming machine tournament area.

E. Notwithstanding paragraph ~~23.7~~ 23.11 (A) of this Section, if the gaming machine is a progressive or multi-game machine, the CNGC, or the operations subject to the approval of the CNGC, may develop and implement alternative procedures to verify payouts.

### **23.12 Table Games**

A. The surveillance system of operations operating four (4) or more table games shall provide at a minimum one (1) PTZ camera per two (2) tables and one (1) dedicated camera capable of taping:

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1. With sufficient clarity to identify customers and dealers; and,
  2. With sufficient coverage and clarity to simultaneously view the table bank and determine the configuration of wagers, card values, and game outcome.
- B. One (1) dedicated camera per table and one (1) PTZ camera per four (4) tables may be an acceptable alternative procedure to satisfy the requirements of subsection (A) in this standard.
- C. The surveillance system of operations operating three (3) or fewer table games shall:
1. Comply with the requirements of paragraph ~~23.10~~ 23.12 (A) of this Section; or
  2. Have one (1) overhead camera at each table.
- D. Table games with a guaranteed base jackpot of Twenty-five Thousand Dollars (\$25,000.00) or more shall be recorded and monitored by dedicated cameras that provide coverage of the following:
1. The table surface sufficient that the card values and card suits can be clearly identified.
  2. An overall view of the entire table with sufficient clarity to identify customers and dealers.
  3. A view of the progressive meter jackpot amount. If several tables are linked to the same

progressive jackpot meter, only one (1) meter need be recorded.

**23.13 Card Games**

- A. The surveillance system shall utilize one (1) dedicated camera per table for live games capable of taping:

1. With sufficient clarity to identify customers and dealers; and,
2. With sufficient coverage and clarity to simultaneously view the dealer's bank and determine the configuration of wagers, card values, and game outcome.

- B. One (1) PTZ camera per four (4) tables shall be used to monitor and record the general activities in each card room and be capable of identifying the employees performing the different functions.

- C. Progressive card games (e.g. Bad Beats) with a progressive jackpot of Twenty-five Thousand Dollars (\$25,000.00) or more shall be monitored and recorded by dedicated cameras that provide coverage of the following:

1. The table surface, sufficient that the card values and card suits can be clearly identified.
2. An overall view of the entire table with sufficient clarity to identify customers and dealers.
3. A view of the progressive meter jackpot amounts.

**23.14 Craps/Roulette**

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- A. All craps tables shall have two (2) dedicated cross view cameras covering both ends of the table.
- B. All roulette areas shall have one (1) overhead dedicated camera covering the roulette wheel and shall also have one (1) dedicated camera covering the play of the table.

**23.15 Tournaments**

Tournaments shall adhere to requirements in Sections ~~23.9~~ 23.11 (D) Gaming Machines, ~~23.10~~ 23.12 (B) Table Games, and ~~23.11~~ 23.13 (B) Card Games.

**23.16 Pari-Mutuel Wagering**

- A. The surveillance system shall monitor and record a general overview and activities occurring in the betting station area with sufficient clarity to identify ticket writer/cashier and customers.
- B. Each betting station shall be equipped with one (1) dedicated overhead camera covering the transaction area.
- C. The surveillance system shall provide an overview of all wagering/cash transactions. This overview shall include the customer, the employee and kiosk, and the surrounding area.

**23.17 Point of Sale (POS) / Kiosks / Drop and Issue**

The surveillance system shall monitor and record a general overview of activities occurring in each highly secured area where

monetary and/or non-monetary transactions are conducted with sufficient clarity to identify employees and customers.

A. Stationary POS / Manned Kiosk / Players Club

- 1. Each cashier station shall be equipped with one (1) dedicated overhead camera covering the transaction area.
- 2. The surveillance system shall provide an overview of cash and/or cash equivalent transactions.
- 3. This overview should include the customer, the employee, and the surrounding area.

B. Mobile POS

- 1. The surveillance system shall provide an overview of cash and/or cash equivalent transactions.
- 2. This overview should include the customer, the employee, and the surrounding area.

C. Electronic Kiosks

- 1. Each kiosk shall be equipped with one (1) dedicated camera with sufficient clarity to identify customer transactions.
- 2. Surveillance shall be notified prior to access to the electronic kiosks.

**23.18 Main Cage / Vaults / Soft Count / Drop and Issue**

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A. Cage / Vault / Soft Count

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 and customers and employees at the counter areas.
2. Each cashier station shall be equipped with one (1) dedicated overhead camera covering the transaction area.
3. The surveillance system shall provide an overview of cash transactions. This overview should include the customer, the employee, and the surrounding area.

B. Fills and Credits

1. 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.
2. Controls provided by a computerized fill and credit system may be deemed an adequate alternative to viewing the Fill and Credit slips.

C. Currency and Coin

1. The surveillance system shall monitor and record with sufficient clarity all areas where currency or coin may be stored or counted.
2. The surveillance system shall provide for:
  - a. Coverage of currency counters shall be sufficiently clear to view any attempted manipulation of the recorded data.
  - b. Monitoring and recording of the table game drop box storage rack or area by either a dedicated camera or a motion-detector activated camera.
  - c. Monitoring and recording of soft count room, including all doors to the room, all table game drop boxes, safes, and counting surfaces, and all count team personnel. The counting surface area must be continuously monitored and recorded by a dedicated camera during the soft count.
  - d. Audio capability of the soft count room shall also be maintained.
  - e. Monitoring and recording of all areas where currency is sorted, stacked, counted, verified, or stored during the soft count process.
3. The surveillance system shall monitor and record a general

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overview of the activities occurring in each gaming machine cashiers station.

**23.19 Promotional Drawings and Devices**

A. For promotional drawings with a prize value (in total) of One Thousand Two Hundred Dollars (\$1,200.00) or more, the following standards shall apply:

1. For any manual hopper, a dedicated camera or PTZ camera with sufficient coverage and clarity to identify customers and/or employees accessing or dropping drawing tickets for the duration of the promotion.
2. For electronic drawings, a dedicated camera or PTZ camera with sufficient coverage and clarity to oversee the execution of the drawing(s).

B. For promotional devices utilized to determine the outcome of any promotional offer (e.g. random number generator (RNG) devices, promotional kiosks, promotional gaming devices, etc.), a dedicated camera or PTZ camera with sufficient coverage and clarity to identify customers and device output during times that the device is active.

**23.20 Information Technology (IT) Data Facilities**

A. The surveillance system shall monitor and record a general overview of activities occurring in each IT data facility where any personnel, contractor, temporary

employee, and/or vendor employees perform work in or use IT data facilities.

B. Designated IT data facilities containing IT equipment will be secured and protected from unauthorized physical access as follows:

1. Designated IT data facilities/equipment include but are not limited to:
  - a. Communication Equipment;
  - b. Main Distribution Frame (MDF) Closets;
  - c. Intermediate Distribution Frame (IDF) Closets;
  - d. Information Technology Data Center;
  - e. Servers;
  - f. Workstations requiring secure access;
  - g. Electronic Gaming Systems; and,
  - h. Any other secured IT area
2. The entrance to the surveillance server and gaming server rooms shall be located so that it is not readily accessible by either gaming operation employees who work primarily on the casino floor or the general public.
3. Access to all IT data facilities shall be controlled using swipe

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- badges, in addition to a manual log that each person must sign, for entry to the server room.
4. All IT data facilities shall have surveillance coverage on all doors accessing the IT data facility and surveillance coverage for the server racks.
  5. All vendors requiring access to IT data facilities shall have an escort that must remain with them for the duration of their work in the server room. Surveillance shall be notified before vendors enter IT data facilities and entry/exit shall be logged in using the standards in ~~23.1(D)(3) and (4)~~ 23.2(D).
  6. Access to IT data facilities shall be limited to authorized personnel and shall apply to ~~23.1(D)(3) and (4)~~ 23.2(D).

**23.21 Warehouse / Other Areas (CA(23.18))**

A. Any area used for the storage of inventory shall be monitored by Surveillance, and shall contain a general overview of the stored items, or the shelving, cages, boxes, etc. with sufficient clarity to identify employees and vendors who access the area.

1. Storage for non-controlled items may include but not be limited to areas such as storage closets, storage room, warehouse and other facilities and/or buildings.

2. Any access to the secured storage containers that store controlled items (e.g. ticket paper, cards, chips, felts, players club cards, etc.) require:
  - a. Surveillance shall be notified of any access to the storage area of controlled items and confirmation shall be provided prior to entry;
  - b. A Security Officer must be physically present;
  - c. The individuals accessing the secured items must be identified by name, position, employee number, and purpose for entry;
  - d. Access to secured items shall be logged by Surveillance and/or Security Operations and made available to CNGC for review upon request; and,
  - e. If the storage container is portable, notification shall be provided to the CNGC prior to moving/relocating the container. A CNGC Agent shall confirm camera coverage for compliance prior to the utilization of the new storage location.

B. The surveillance system shall monitor and record non-public areas with sufficient clarity to identify employees and/or vendors, their activities, and be able to determine the movements/access routes they may take during the process of their duties. Surveillance shall include,

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**SURVEILLANCE SURVEILLANCE**

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but not be limited to, the following areas:

1. Hallways;
2. Break Rooms;
3. Employee Lockers;
4. Banquet/Meeting Rooms;
5. Kitchens;
6. Food and Beverage Storage;
7. Storage for Alcohol/Beer; and,
8. Entrances