

CHAPTER 9
SURVEILLANCE

SECTION 1 DEFINITIONS, MINIMUM STANDARDS

- A. “PTZ camera” means a video camera which possesses, at a minimum, pan, tilt and zoom capabilities or features comparable thereto.
- B. “Dedicated camera” means a video camera which is required by this regulation or an order of the Gaming Commission, or a court of competent jurisdiction, to continuously monitor and record a specified activity.
- C. This regulation sets forth the minimum standards that must be followed by the gaming operator with respect to surveillance systems. The Gaming Commission may, in its discretion, require a gaming operator to comply with surveillance system requirements that are more stringent than those set forth in this regulation.

SECTION 2 SURVEILLANCE SYSTEMS: GENERAL STANDARDS

- A. Any gaming operator shall install, maintain and operate at all times a surveillance system comprised of cameras, monitors, videotape and/or digital recorder, and a printer, that provides the coverage required by this regulation.
- B. The surveillance system must include date and time generators that display on each videotape and/or digital recording the date and time of the recorded events. The displayed date and time must not significantly obstruct the recorded view.
- C. All equipment that may be utilized to monitor or record views obtained by the surveillance systems must be and must remain located in a room used exclusively for surveillance purposes. The entrance to the surveillance room or secured location must be located away from the view of casino employees and the general public.
- D. Surveillance room equipment must have total override capability over any other satellite monitoring equipment in other offices.
- E. The Gaming Commission, the Mississippi Gaming Commission, the National Indian Gaming Commission, and their agents shall at all times be provided immediate access to the surveillance room and other surveillance areas. Otherwise, access to the room is restricted to authorized personnel only.
- F. The surveillance system shall be staffed for all shifts and activities by personnel trained in the use of the equipment, knowledge of the games and house rules. Surveillance system personnel must be employed and trained by the gaming operator in accordance with minimum standards approved by the Gaming Commission, exclusively for surveillance purposes, and must possess knowledge of all table games and the gaming operator's house rules pertaining to gaming operations.
- G. The surveillance system and its equipment must be directly and securely wired in a way to prevent tampering. An auxiliary power source must be available and capable of providing uninterrupted power to the surveillance system in the event of a power loss and provide sufficient lighting to operate the surveillance system.
- H. Each camera required by 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 record multiple gaming and count room activities, and record the views of all dedicated cameras and PTZ cameras.
- I. Access to surveillance room shall be limited to surveillance personnel, designated employees, and other persons authorized in accordance with the surveillance department policy. Such policy shall be approved by the Choctaw Gaming Commission. The surveillance department shall maintain a sign-in log of other authorized persons entering the surveillance room.

- J. Cameras in the surveillance system located in public areas should be placed behind a smoked glass dome, a one-way mirror, or other similar material which conceals the camera from view. As the occasion merits, some cameras may be publicly visible.
- K. The surveillance system may view and record in black-and-white, except that pit transactions occurring at the casino cage and views of roulette tables must be viewed and recorded in color.
- L. The printer used in the surveillance system must possess the capability to generate instantaneously upon command, a clear, still, black-and-white or color copy or photograph of the images depicted on a recording.
- M. The gaming operator must have the capability of creating first generation copies of video surveillance tapes that are one-half inch standard speed VHS format or other format approved by the Gaming Commission.

SECTION 3 SURVEILLANCE SYSTEMS: COUNT ROOMS AND CASINO CAGE

- A. Any gaming operator shall install, maintain and operate at all times a surveillance system to monitor and record clear unobstructed views of all areas and transactions within:
1. The hard count room and any area where uncounted coin is stored during the drop and count process, including walls, doors, scales, wrapping machines, coin sorters, vaults, safes, and general work surfaces. Coverage of scales shall be sufficiently clear to view any attempted manipulation of the recorded data;
 2. The soft count room, including all walls, all doors to the room, all table game drop boxes, vaults, 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. All counting surfaces must be transparent;
 3. All areas where currency is sorted, stacked, counted, verified, or stored during the soft count process;
 4. All areas where coin may be stored or counted, including the hard count room, 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;
 5. The table game drop box storage rack or area by either a dedicated camera or a motion-detector activated camera;
 6. The casino cage, including customer windows, employees' windows, cash drawers, vaults, safes, counter, chip storage, fill windows, and employees within the cage, customers and employees at the counter areas; and
 7. 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 be deemed an adequate alternative to viewing the fill and credit slips.
- B. All transactions within the hard count room, soft count room, and casino cage, must maintain a surveillance system to monitor and record them with sufficient clarity to permit identification of each employee and his movements, and to permit identification of all currency, coins, and paperwork. The soft count room shall have audio monitoring capabilities. The soft and hard count room recordings (audio, digital and video) must be retained for thirty (30) days.

SECTION 4 SURVEILLANCE SYSTEMS: TABLE GAMES AND CARD ROOMS

- A. Any gaming operator who operates table games or a card room shall install, maintain, and operate at all times a surveillance system that provides at least one (1) pan-tilt-zoom camera per two (2) tables and possesses the capability to monitor and record clear and unobstructed views of the following:
1. All table game and card room areas with sufficient clarity to permit identification of all dealers, patrons, spectators and pit personnel;
 2. All table games or card table surfaces, including table bank trays, with sufficient clarity to permit identification of all chip, cash, dice and card values, and the outcome of the games. Roulette tables and wheels must be recorded so as to permit views of both the table and the wheel on one monitor screen;
 3. All drop boxes and table numbers; and
 4. All card room or podium banks, including drawers, cabinets and safes contained therein.

The surveillance system shall monitor and record general activities in each room with sufficient clarity to identify the employees performing the different functions.

- B. The surveillance system must have the capability to view and record simultaneously both the table game area and the table game surface.
- C. All craps tables shall have two (2) dedicated cross view cameras covering both ends of the table. All roulette areas shall have one (1) overhead dedicated camera covering the roulette wheel and shall also have one (1) dedicated overview of the play of the table. All big wheel games shall have one (1) stationary camera viewing the wheel.

SECTION 5 SURVEILLANCE SYSTEMS: KENO, PROGRESSIVE TABLE GAMES, BINGO, PARI-MUTUEL AND SLOT MACHINES

- A. Any gaming operator who operates a keno game shall install, maintain, and operate at all times a surveillance system that continuously monitors and records clear and unobstructed views of the following while the game is exposed for play:
1. All keno desks, and satellite stations, including counters, windows, cash drawers, keno boards, supervisor work areas, and transaction areas, with sufficient clarity to permit identification of cash, all parts of a keno ticket, the patrons and employees; and
 2. The keno ball and bingo ball drawing device and the random number generator in computerized systems, shall be recorded during the course of the draw by a dedicated camera with sufficient clarity or automatically activated camera with sufficient clarity to identify the number on each ball drawn.
- B. Each progressive table game with a potential progressive jackpot of \$25,000 or more shall be recorded and monitored by dedicated cameras that provide coverage of:
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 patrons and dealer; and
 3. 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.
- C. The surveillance system in the bingo game area 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.
- D. The surveillance system shall monitor and record general activities in each race book, sports pool and pari-mutuel book ticket writer and cashier area with sufficient clarity to identify the employees performing the different functions.
- E. Any gaming operator who exposes slot machines for play shall install, maintain, and operate at all times a surveillance system that continuously monitors and records clear, unobstructed, overall, and continuous views of all areas that contain slot machines with sufficient clarity to identify all patrons and employees. The recordings must be retained for at least ten (10) days after the date of the recording.
- F. Any gaming operator who exposes slot machines for play shall install, maintain, and operate at all times a surveillance system to monitor and record clear and unobstructed views of all slot change booths, including their cash drawers, counter tops, counting

machines, customer windows, and employee windows, recorded with sufficient clarity to permit identification of all transaction, cash, paperwork, patrons and employees.

- G. Each slot machine offering a payout of more than \$250,000 shall be monitored and recorded by dedicated camera(s) to provide coverage of:
1. All patrons and employees at the slot machine; and
 2. The face of the gaming machine, with sufficient clarity to identify the payout line(s) of the slot machine.
- H. The gaming operator shall establish and maintain an on-line system capable of assessing a signal sent by the system to indicate when the compartment of the slot machine is accessed. This should be located in the Surveillance room and monitored for suspicious activity. In the event that a slot machine is accessed illegally, the surveillance personnel should identify the machine, section, row, position, and the employees accessing the machine.
- I. Any deviations from this chapter or suspicious behavior should be reported to the Gaming Commission immediately.
- J. The surveillance system shall monitor and record general activities in the pari-mutuel area, to include the ticket writer and cashier areas, with sufficient clarity to identify the employees performing the different functions.
- K. In-house progressive slot 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 patrons and employees at the slot machine; and
 2. The face of the slot machine, with sufficient clarity to identify the payout line(s) of the slot machine.
- L. Wide area progressive slot machines offering a base payout amount of more than \$1.5 million 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 slot machine; and
 2. The face of the slot machine, with sufficient clarity to identify the payout line(s) of the slot machine.

NOTE: Notwithstanding paragraph G of this section, if the slot machine is a multi-game machine, the Choctaw Gaming Commission, or the gaming operation

subject to the approval of the Choctaw Gaming Commission, may develop and implement alternative procedures to verify payouts.

- M. With regard to the following functions, controls must also include:
1. Surveillance of the progressive prize meters for Class II gaming systems at the following thresholds:
 - a. Wide area progressives with a reset amount of \$1 million; and
 - b. In-house progressives with a reset amount of \$250,000.
 2. Manual bingo:
 - a. For manual draws, the surveillance system must monitor the bingo ball drawing device or mechanical random number generator, which must be recorded during the course of the draw by a dedicated camera to identify the numbers or other designations drawn; and
 - b. The surveillance system must monitor and record the activities of the bingo game, including drawing, and entering the balls, numbers or other designations drawn.
 3. Card games:
 - a. Except for card game tournaments, a dedicated camera(s) with sufficient clarity must be used 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; and
 - (iii) An unobstructed view of all posted progressive pool amounts.
 - b. For card game tournaments, a dedicated camera(s) must be used to provide an overview of tournament activities, and any area where cash or cash equivalents are exchanged.

4. Cage and vault:
 - a. The surveillance system must monitor and record a general overview of activities occurring in each cage and vault area with sufficient clarity to identify individuals within the cage and patrons and staff members at the counter areas and to confirm the amount of each cash transaction;
 - b. Each cashier station must be equipped with one (1) dedicated overhead camera covering the transaction area; and
 - c. The cage or vault area in which exchange and transfer transactions occur must be monitored and recorded by a dedicated camera or motion activated dedicated camera that provides coverage with sufficient clarity to identify the chip values and the amounts on the exchange and transfer documentation. Controls provided by a computerized exchange and transfer system constitute an adequate alternative to viewing the amounts on the exchange and transfer documentation

5. Count rooms:
 - a. The surveillance system must monitor and record with sufficient clarity a general overview of all areas where cash or cash equivalents may be stored or counted; and
 - b. The surveillance system must provide coverage of count equipment with sufficient clarity to view any attempted manipulation of the recorded data.

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

SECTION 6 SURVEILLANCE SYSTEMS: CASINO SECURITY OFFICERS, CASINO SURVEILLANCE SYSTEM MALFUNCTIONS

- A. The surveillance system must cover all of any security office wherein any persons may be detained, questioned, interviewed or interrogated by the gaming operator's security officers. Security office coverage must include both audio and video, and be recorded at all times that a person is detained, questioned, interviewed or interrogated therein, and the signal must terminate in the surveillance room. The recordings must be retained by the gaming operator for at least thirty (30) days after the recorded event. 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.
- B. Any gaming operator shall establish and maintain a written log of any and all casino surveillance systems equipment malfunctions.
- C. Reasonable effort shall be made to repair each surveillance system malfunction within seventy-two (72) hours of the malfunction. The Choctaw Gaming Commission shall be notified of any camera(s) that have malfunctioned for more than twenty-four (24) hours. If repair is not completed within twenty-four (24) hours, the gaming operator shall immediately submit a written report to the Gaming Commission that sets forth the reason for the delay in repair. The report must be retained by the gaming operator for at least thirty (30) days after submission to the Gaming Commission. The Chairman may in his discretion order that all activity in the area affected by the malfunction be suspended pending repair.
- D. In the event of a malfunction of a dedicated camera, recorder or monitor, the activity, games or slot machines being viewed must be suspended or closed pending repair.

SECTION 7 SURVEILLANCE SYSTEM RECORDING REQUIREMENTS

- A. In addition to any other recording requirements that are or may be imposed by this regulation, any gaming operator shall record all views, activities, and locations as the Gaming Commission may from time to time require.
- B. The gaming operator shall provide, operate and maintain one video/digital recorder for every six video/digital cameras in the surveillance system.
- C. The gaming operator shall videotape, record and maintain a written log of all activities observed by the casino surveillance personnel that appear unusual or irregular, or that violate or appear to violate any criminal statute of the United States or the Mississippi Band of Choctaw Indians, Title XV of the Choctaw Tribal Code, the Tribal-State Compact, the Indian Gaming Regulatory Act of 1988 *et. seq.*, or the regulations promulgated thereunder, and notify the Gaming Commission immediately.
 - 1. Surveillance personnel shall maintain a log of all surveillance activities;
 - 2. Such log shall be maintained by surveillance room personnel and shall be stored securely within the surveillance department;
 - 3. At a minimum, the following information shall be recorded in a surveillance log:
 - a. Date;
 - b. Time commenced and terminated; and
 - c. Activity observed or performed.
- D. A video library log, or comparable alternative procedure approved by the Choctaw Gaming Commission, shall be maintained to demonstrate the storage, identification, and retention standards required in this section have been complied with.
- E. Each gaming operator shall maintain a log that documents each malfunction and repair of the surveillance system as defined in this section. 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 required, and where applicable, any alternative security measures that were taken.
- F. All recordings produced by a surveillance system must present a clear and unobstructed view of the scene depicted thereon.
- G. The gaming operator must retain all recordings for at least ten (10) days after the recording is produced, unless a longer time period is required by another Section of this regulation, or by order of the Gaming Commission or a court of competent jurisdiction.

- H. Every recording must be labeled by surveillance personnel with the date and time period of the recording and the areas covered by the recording, and signed by the person who made the recording, by no later than the end of the shift during which the recording was made.
- I. All recordings must be made in real time and not in a time lapse recording mode, except that videotape recordings produced pursuant to the provisions of Section 6 of this regulation may be made in a time lapse recording mode.
- J. All recordings must be stored in a secure area with access limited to authorized personnel only.
- K. Duly authenticated copies of video/digital recordings and/or digital records shall be provided to the Choctaw Gaming Commission upon request.
- L. Suspected crimes, suspicious activity, or detentions by security agents discovered within the initial retention period must be copied and retained for a time period not less than one (1) year.

SECTION 8 SURVEILLANCE SYSTEM PLANS: ALTERATIONS TO SURVEILLANCE SYSTEM

- A. Any gaming operator shall submit to the Gaming Commission, a surveillance system plan no later than ninety (90) days prior to the opening of the licensed premises for business.
- B. The surveillance system plan must include a floor plan that shows the placement of all surveillance equipment in relation to the locations required by this regulation to be covered, and a detailed description of the surveillance system and its equipment. In addition, the plan may include other information that evidences compliance with this regulation by the applicant.
- C. A gaming operator shall submit to the Gaming Commission any amended plan reflecting any alteration of the surveillance system within thirty (30) days after the alteration.

SECTION 9 REPORTING OF VIOLATIONS

- A. Any violation(s) of the provisions of the Tribal-State Compact, Tribal Ordinances, or Choctaw Gaming Commission Regulations by a management contractor, a Gaming employee, or any person on the casino premises whether or not associated with the Tribal Gaming operation shall be reported immediately to the Choctaw Gaming Commission.