

Chapter 5

SURVEILLANCE REQUIREMENTS REGULATION Regulation # R400-04:GC-05

Chapter 5 Surveillance Requirements Regulation

Section 1. Purpose; Authority

1-1. *Purpose.* The purpose of a gaming facility surveillance system is to safeguard assets, to deter, detect and prosecute criminal acts, and maintain public confidence and trust that gaming at the gaming enterprise is conducted honestly and free of criminal elements and activity.

1-2. *Authority.* These minimum internal control standards rules and regulations are issued under and pursuant to the authority of the Gaming Ordinance #02-400-01, Commission's Ordinance #04-150-01, Gaming Commission Ordinance #04-400-04 ; IGRA, Compact with the State of Michigan, Tribal Constitution and, Part 542 of the National Indian Gaming Commission Minimum Internal Control Standards.

Section 2. Surveillance Department

2-1 The surveillance system shall be maintained and operated from a staffed surveillance room and shall provide surveillance over gaming areas during all shifts and all activities.

2-2 The entrance to the surveillance room 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.

2-3 Access to the surveillance room shall be limited to surveillance personnel, designated employees, and other persons authorized in accordance with the Gaming Commission approved Access Policy. The surveillance department shall maintain a sign-in log of other authorized persons entering the surveillance room.

2-4 The surveillance department will be staffed with trained personnel. The personnel will be trained in the use of the equipment, knowledge of the games, and house rules.

Section 3. Surveillance Equipment

3-1 Surveillance room equipment shall have total override capability over all other satellite surveillance equipment located outside the surveillance room.

3-2 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, backup generator, or an alternate utility supplier, satisfy this requirement.

3-3 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.

3-4 Each camera required by the standards in this regulation shall be installed in a manner that will prevent it from being readily obstructed, tampered with, or disabled by customers or employees.

3-5 Each camera required by the standards in this regulation 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 motion activated dedicated cameras.

3-6 Reasonable effort shall be made to repair each malfunction of surveillance system equipment required by the standards in this regulation within forty-eight (48) hours after the malfunction is discovered. The Gaming Commission shall be notified of any camera(s) that has malfunctioned for more than twenty-four (24) hours.

a. In the event of a dedicated camera 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.

3-7 *Analog Systems Sufficient Clarity Requirements*

- a. Continuous movement must be recorded at a frame rate of 30 frames per second (FPS);
- b. Resolution must be sufficient to produce a video record that is a complete and accurate representation of the activity being observed;
- c. Any areas covered by motion detection must record live action at the frame rate of 30 FPS.

3-8 *Digital Systems (referred to as DVR systems)*

- a. The DVR system must capture record and view continuous movement at a minimum rate equivalent to 30 IPS (Images Per Second);
- b. The resolution must be sufficient to produce a video record that is a complete, accurate and viewable representation of the activity being observed;
- c. The DVR system must have pre- and post-alarm activation at a minimum of five (5) seconds (before and after event) for those areas in which motion-activated cameras are allowed;
- d. Viewing and recording size of images will be at a minimum of CIF or FCIF for all inclusive areas of the DVR system;
- e. An internal back-up system must be included in the configuration to perform in the event that a hard drive failure will have a negative impact on the system's ability to record video images;
- f. The DVR System must have a failure notification function consisting, at a minimum, of both audible and visual warning devices when system failure could negatively impact the ability to record, play back or store video images;
- g. If the gaming enterprise chooses to utilize a network (also referred to as NVR System) for the interconnection of or playback from digital recording devices, access to this network must be limited to authorized personnel and be password or code protected in order to maintain integrity and data network security;
- h. If the gaming enterprise elects to utilize authentication/encryption code software, the software must be submitted to the Gaming Commission for inspection and approval.

3-9 *Entrances and Exits.* All entrances and exits to the gaming enterprise shall be monitored by dedicated stationary cameras.

3-10 *Exterior of Facility.* Cameras or Security shall be positioned to enable coverage of the entire exterior of the gaming enterprise.

Section 4. Card Games

4-1 *Card games.* The surveillance system shall monitor and record general activities in each card room with sufficient clarity to identify the employees performing the different functions.

4-2 *Progressive Card Games.* Progressive card 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 posted jackpot amount.

Section 5. Table Games

5-1 Any gaming enterprise *with four (4) or more table games.* Except as otherwise provided in paragraphs (5-4), (5-5), and (5-6) of this section, the surveillance system of gaming operations operating four (4) or more table games shall provide at a minimum one (1) pan-tilt-zoom camera per two (2) tables and surveillance must be capable of taping:

- a. With sufficient clarity to identify customers and dealers; and
- b. With sufficient coverage and clarity to simultaneously view the table bank and determine the configuration of wagers, card values, and game outcome.
- c. One (1) dedicated camera per table and one (1) pan-tilt-zoom camera per four (4) tables may be an acceptable alternative procedure to satisfy the requirements of this paragraph.

5-2 *All Table Games.* There shall be a minimum of one dedicated camera over each table game to provide an overview of the entire table with sufficient clarity to identify patrons and dealers.

5-3 *Craps.* All craps tables shall have two (2) dedicated cross view cameras covering both ends of the table.

5-4 *Roulette.* 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.

5-5 *Big wheel.* All big wheel games shall have one (1) dedicated camera viewing the wheel.

5-6 *Progressive Table Games.* 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 6. Gaming Machines

6-1 *All Gaming Machines.* Every gaming machine shall be able to be viewed by at least one (1) PTZ camera.

6-2 Except as otherwise provided in paragraphs (6-3) and (6-4) of this section, gaming machines offering a payout of more than \$250,000 shall be monitored and 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.

6-3 *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:

- 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.

6-4 *Wide-area progressive machine.* Wide-area progressive gaming machines offering a base payout amount of \$1 million 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.

6-5 Notwithstanding paragraph 6-1 of this section, if the gaming machine is a multi-game machine, the Gaming Commission, or the gaming enterprise subject to the approval of the Gaming Commission, may develop and implement alternative procedures to verify payouts.

Section 7. Cage and Vault

7-1 General

- a. 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.
- b. Each cashier station shall be equipped with one (1) dedicated overhead camera covering the transaction area.
- c. The surveillance system shall provide an overview of cash transactions. This overview shall include the customer, the employee, and the surrounding area.
- d. Non-Customer areas of the Cage and Vault shall have at least two (2) dedicated camera with cross views to prevent blind spots.

7-2 Fills and credits.

- a. 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.
- b. Controls provided by a computerized fill and credit system maybe deemed an adequate alternative to viewing the fill and credit slips.

7-3 *Currency and coin.*

- a. The surveillance system shall monitor and record with sufficient clarity all areas where currency or coin may be stored or counted.
- b. Audio capability of the soft count room shall also be maintained.
- c. The surveillance system shall provide for:
 1. Coverage of scales shall be sufficiently clear to view any attempted manipulation of the recorded data.
 2. Monitoring and recording of the table game drop box storage rack or area and the bill validator canister storage carts or area by either a dedicated camera or a motion-detector activated camera.
 3. Monitoring and recording of 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.
 4. 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.
 5. Monitoring and recording of all areas where currency is sorted, stacked, counted, verified, or stored during the soft count process.

7-4 *Change booths.* The surveillance system shall monitor and record a general over view of the activities occurring in each gaming machine change booth.

Section 8. Video Recording and/or Digital Record Retention

8-1 *Video Recordings*

- a. All video recordings and/or digital records of coverage provided by the dedicated cameras or motion-activated dedicated cameras required by the standards in this section shall be retained for a minimum of seven (7) days.
- b. Recordings involving suspected or confirmed gaming crimes, unlawful activity, or detentions by security personnel, must be retained for a minimum of thirty (30) days.
- c. Duly authenticated copies of video recordings and/or digital records shall be provided to the Gaming Commission upon request.

8-2 *Video library log.* A video library log, or comparable alternative procedure approved by the Gaming Commission, shall be maintained to demonstrate compliance with the storage, identification, and retention standards required in this section.

8-3 *Malfunction and repair log.*

- a. Surveillance personnel shall maintain a log or alternative procedure approved by the Gaming Commission that documents each malfunction and repair of the surveillance system as defined in this section.
- b. 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.

8-4 *Surveillance log.*

- a. Surveillance personnel shall maintain a log of all surveillance activities.
- b. Such log shall be maintained by surveillance room personnel and shall be stored securely within the Surveillance Department.

c. 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.

d. 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.