



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

July 23, 2018

NOTICE OF INTENT TO ADOPT

Pursuant to 15 MLBSA § 305(b)(2), this serves as the official notice of intent to adopt the following:

**Changes to:
DETAILED GAMING REGULATION 9,
Surveillance**

Summary of changes:

The GRA made changes to grammar, spelling and formatting where applicable. Job titles and abbreviations were edited for consistency throughout the document. The following substantive changes to DGR 9 are intended to remove areas encroaching upon operational authority, insulate camera coverage requirements, and address control deficiencies in system security:

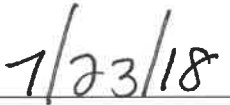
1. The GRA moved existing sections of the regulation to clearly define Surveillance Operations Room standards versus Surveillance Technical Standards.
2. An important deletion was made to a section prohibiting the Gaming Enterprise from hiring former Surveillance employees who did not leave the GRA in good standing without prior GRA approval. The GRA felt placing restrictions on employment overstepped our authority; the GRA will take licensing action upon former Surveillance employees if they are deemed a threat to the integrity of gaming.
3. New Part II Section 1 (B) was previously embedded in another section and was made its own and clarified to require GRA Board approval for creation or modification to satellite surveillance areas.
4. New Part II Section 1 (I) was added to generally supplement the specific game, cage, and count room camera coverage requirements. The intent of the addition was to provide protection over areas of risk not already specifically defined in the regulation.
5. New Part II Section 1 (J) was added to define a minimum notice time frame for changes to areas requiring camera coverage. Equipment ordering, staffing, and logistics need time to prepare for a camera move when gaming operations makes a change.
6. Camera coverage requirements for specific games did not change drastically. More Bingo overview was added, Pull Tab overview was added, Class II Gaming Systems was added to help account for gaming regulated by new DGR 12a – Class II Gaming Systems, current card and table game pan-tilt-zoom camera placement was codified, and general Video Games of Change coverage was defined.
7. Part II Section 5 was enhanced to account for digital logs as well as paper logs.
8. New Part II Section 7 (D) was added to supplement DGR 8 – Information Technology standards. Like gaming system installations, changes, and modifications require GRA Board approval, this section is intended to require the same accountability for significant changes to the overall Surveillance System.

The substantive changes proposed by the GRA are reflected throughout the regulation and cannot be found in any one section.

Pursuant to 15 MLBSA § 305(b)(2)(A): Comments may be submitted on the proposed regulation no later than thirty (30) days from the date of the notice; the proposed regulation may be modified if supported by the data and views submitted. Comments may be submitted **no later than 5:00 p.m. on August 23, 2018**, to the Executive Director of the Office of Gaming Regulation & Compliance at **Gaming Regulatory Authority, 700 Grand Avenue, Onamia, MN 56359** or faxed to **(320) 532-8893**.



Gaming Regulatory Authority Board



Date



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Gaming Regulatory Authority
Detailed Gaming Regulations

SURVEILLANCE

Document No. DGR – 9

Effective: **August 30, 2016**

I. SURVEILLANCE STANDARDS.

Section 1. Surveillance Operations Room.

- A. The Gaming Regulatory Authority (GRA) must maintain and operate a staffed surveillance operations room(s) and shall provide surveillance over any licensed gaming facility. Surveillance staff shall be comprised of employees of the GRA under the day to day supervision of the Director of Surveillance.
- B. The entrance to the surveillance operations room(s) shall be appropriately secured to prevent unauthorized access.
- C. Access to the surveillance operations room(s), viewing rooms and satellite locations (any office with surveillance output, equipment rooms) shall be limited to Surveillance employees, designated employees and other persons authorized.
 1. Lists of authorized individuals who may be admitted to the surveillance operations rooms, viewing rooms and satellite locations must be approved by the GRA Board annually. Persons not included on the list of approved individuals will only be allowed access with approval of one of the following: Directors of the OGR&C or Surveillance, Operations Managers, Technical Manager and Investigator(s).
 2. Surveillance Operations rooms, Surveillance and Security viewing rooms, and satellite locations shall maintain sign-in logs of persons viewing coverage in these areas.
 3. The Director of Surveillance or designee shall notify the GRA Board at or before its next regularly scheduled Board meeting if persons not included on the list of approved individuals are admitted to any surveillance operations rooms, viewing rooms or satellite locations.
- D. Each Gaming Enterprise shall have access to electronic surveillance output for management purposes.
- E. The surveillance operations room must be staffed at all times by employees trained in the use of the equipment with knowledge of the games and house rules.

Section 2. Surveillance Log.

- A. Surveillance employees shall maintain a log of all surveillance activities.
- B. Such log must be stored securely.
- C. At a minimum, the following information must 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 employee who initiates, performs, or supervises the surveillance.
 - e. Surveillance employees shall also record a summary of the results of the surveillance of any suspicious activity. This summary may be maintained in a separate log.
- D. Information entered on the surveillance log must be maintained for at least five (5) years.



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Section 3. Reports and Inspections.

- A. Any reports or other records of the Surveillance Department must be maintained for a minimum period of five (5) years.
- B. The Executive Director of OGR&C or authorized designee, will inspect the surveillance room annually to ensure:
 - 1. All equipment is working properly;
 - 2. No camera views are blocked or distorted by improper lighting or obstructions;
 - 3. All required surveillance capabilities are in place; and
 - 4. General compliance with these regulations.
- C. GRA Board approved procedures must be implemented for reporting suspected crimes and suspicious activity.

II. SURVEILLANCE TECHNICAL STANDARDS.

Section 1. Surveillance System.

- A. 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, storage servers, and storage media.
- B. Creation and modification to satellite surveillance areas require GRA Board approval.
- C. Unless acting as a representative of the GRA, no one shall clean, operate, obstruct the view of or tamper with any Surveillance System without prior consent of one of the following: Directors of the OGR&C or Surveillance, Assistant Executive Director, Operations Managers, and Technical Manager.
- D. Surveillance staff shall have unimpeded access to all satellite surveillance equipment located outside of the surveillance operations room and the surveillance equipment room, to allow for maintenance and inspection of equipment.
- E. All surveillance room equipment must have total override capabilities over all other satellite surveillance equipment located outside the surveillance room.
- F. In the event of power loss to the Surveillance System, an auxiliary or backup power source must be available and capable of providing immediate restoration of power to all elements of the Surveillance System that enable Surveillance employees to observe all areas mandated by the standards established in this regulation. Auxiliary or backup power sources such as an uninterrupted power supply (UPS), backup generator, or an alternate utility supplier, satisfy this requirement. All auxiliary power supplies controlled by the Gaming Enterprise must be maintained and put into operation when circumstances dictate.
- G. The Surveillance System must include date and time generators that possess the capability to display the date and time of recorded events on video and digital recordings. The displayed date and time must not significantly obstruct the recorded view.



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- H. Each camera required by the standards in this section must be installed in a manner that will prevent it from being readily obstructed, tampered with or disabled by patrons or associates.
- I. Camera coverage over the Gaming Enterprises shall be installed in a manner providing protection over associates, patrons, and assets.
- J. Gaming Enterprise changes with the potential to affect camera coverage shall be reported to Surveillance at a minimum of seventy-two (72) hours prior to taking place. Significant Gaming Enterprise changes or construction require Surveillance consultation during planning.
- K. Each camera required by the standards in this section must possess the capability of having its picture displayed on a monitor and recorded. The Surveillance System must 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.
- L. A periodic inspection of the Surveillance System must be conducted. When a malfunction of the Surveillance System is discovered, the malfunction and necessary repairs must be documented and repairs initiated within seventy-two (72) hours.
 - 1. In the event of a dedicated camera malfunction, or software communication malfunction, the Gaming Enterprise or the Surveillance Department shall immediately provide alternative camera coverage or other security measures (such as additional supervisory or security associates) to protect the subject activity.
 - 2. Surveillance technicians must be notified of any camera or Surveillance System that has malfunctioned for more than twenty-four (24) hours. Director of Surveillance or Surveillance Operations managers will determine if alternate security measures are necessary and/or implemented.
 - 3. The GRA Board must be notified of any camera(s) or Surveillance System(s) that has malfunctioned for more than twenty-four (24) hours and the alternative security measures being implemented.

Section 2. Surveillance System Requirements with Respect to Specific Games and Gaming Machines.

A. Bingo.

- 1. Monitor the bingo ball drawing device or random number generator, which must be recorded during the course of the draw by a dedicated camera with sufficient clarity to identify the balls drawn or numbers selected.
- 2. Monitor and record the game board and the activities of the employees responsible for drawing, calling, and entering the balls drawn or numbers selected.
- 3. Coverage adequate to identify associates accessing the bingo storage and staging areas.
- 4. Monitor and record a general overview of activities occurring in the Bingo cage and surrounding area with sufficient clarity to identify associates within the cage



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- and patrons and associates at the counter areas and to confirm the amount of each cash transaction.
5. Bingo hall with sufficient clarity to identify patrons and floorpersons.
- B. Class II Gaming Systems.
1. Monitor and record a general overview of activities occurring in wagering account transaction windows and surrounding areas with sufficient clarity to identify associates within and patrons and associates at the counter areas and to confirm the amount of each cash transaction.
 2. All areas where Class II VGCs can be played or stored will have camera coverage to provide a general overview of patron and associate activity.
- C. Pull Tabs.
1. Coverage adequate to identify associates accessing the storage area.
 2. Monitor and record a general overview of activities occurring in the Pull Tab booths and surrounding areas with sufficient clarity to identify associates within and patrons and associates at the counter areas and to confirm the amount of each cash transaction.
- D. Card Games. Except for card game tournaments, a dedicated camera(s) with sufficient clarity must be used to provide:
1. An overview of the activities on each card table surface, including card values and suits, and cash and cash equivalents;
 2. An unobstructed view of all posted progressive pool amounts;
 3. New and used playing cards to be issued to a table must be maintained in a location with appropriate surveillance coverage; and
 4. One (1) pan-tilt-zoom (PTZ) per every two (2) tables.
- E. Card Game Tournaments.
1. A dedicated camera(s) must be used to provide an overview of tournament activities, and any area where cash or cash equivalents are exchanged.
 2. New and used playing cards to be issued to a table must be maintained in a location with appropriate surveillance coverage.
- F. Table Games.
1. Each table game area with sufficient clarity to identify patrons and dealers.
 2. 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.
 3. One (1) PTZ per every two (2) tables.
- G. Progressive Table Games. Each progressive table game with a progressive jackpot of \$25,000.00 or more must be monitored and recorded by dedicated cameras that provide coverage of:
1. The table surface, sufficient that the card values and suits can be clearly identified;



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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.
- H. Video Games of Chance (VGCs).
1. All areas where VGCs can be played or stored will have camera coverage to provide a general overview of patron and associate activity.
 2. Monitor and record a general overview of activities occurring in wagering account transaction windows and surrounding areas with sufficient clarity to identify associates within and patrons and associates at the counter areas and to confirm the amount of each cash transaction.
 3. VGCs offering a payout of more than \$250,000.00 (excluding bonus rounds) must be monitored and recorded by a dedicated camera(s) to provide coverage of:
 - (a) All patrons and associates at the VGC; and
 - (b) The face of the VGC, with sufficient clarity to identify the payout line(s) of the VGC.
 - (c) The coverage required above does not require one dedicated camera per VGC if one dedicated camera is able to provide the required coverage for more than one VGC.
 4. In-house progressive VGCs. In-house progressive VGCs offering a base payout amount (jackpot reset amount) of more than \$100,000.00 must be monitored and recorded by a dedicated camera(s) to provide coverage of:
 - (a) All patrons and associates at the VGC; and
 - (b) The face of the VGC, with sufficient clarity to identify the payout line(s) of the VGC.
 - (c) The coverage required above does not require one dedicated camera per VGC if one dedicated camera is able to provide the required coverage for more than one VGC.
 5. Wide-area progressive VGCs. Wide-area progressive VGCs offering a base payout amount of more than \$250,000.00 and monitored by an independent vendor utilizing an on-line progressive computer system must be monitored and recorded by a dedicated camera(s) to provide coverage of:
 - (a) All patrons and associates at the VGC; and
 - (b) The face of the VGC, with sufficient clarity to identify the payout line(s) of the VGC.
 - (c) The coverage required above does not require one dedicated camera per VGC if one dedicated camera is able to provide the required coverage for more than one VGC.

Section 3. Surveillance System Requirements with Respect to Cage/Vault and Count Rooms.

- A. Monitor and record a general overview of activities occurring in each cage and vault and surrounding area with sufficient clarity to identify associates within the cage and



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- patrons and associates 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.
 - C. The cage or vault area in which fills and credits are transacted 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 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.
 - D. 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.
 - E. Soft Count. Monitor and record with sufficient clarity all areas where currency may be stored or counted, and must include the following:
 - 1. Soft count room, including all doors to the soft count room, all drop boxes, safes, counting surfaces and all Count Team associates;
 - 2. Surveillance must maintain audio monitoring of the soft count room;
 - 3. The counting surface area must be continuously monitored and recorded by a dedicated camera during the soft count;
 - 4. The drop box storage racks or areas by a dedicated camera or a motion-activated dedicated camera; and
 - 5. 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.

Section 4. Video Recording and Digital Record Retention.

- A. All video recordings and digital records of coverage provided by dedicated cameras or motion-activated dedicated cameras required by the standards in this regulation must be retained for a minimum of seven (7) days.
- B. Recordings involving suspected or confirmed gaming crimes, unlawful activity or detentions by security associates, must be copied and retained for a minimum of five (5) years.
- C. Duly authenticated copies of video recordings and digital records must be provided to the National Indian Gaming Commission (NIGC) and GRA Board upon request.

Section 5. Retention Log. Logs maintained to demonstrate compliance with the storage, identification, and retention standards required in this regulation. Any comparable alternatives to this procedure must be approved by the GRA Board.

Section 6. Malfunction and Repair Log.



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- A. Surveillance employees 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.
 - B. The log must state:
 - 1. Time;
 - 2. Date;
 - 3. Nature of each malfunction;
 - 4. The efforts expended to repair the malfunction;
 - 5. Date of each effort;
 - 6. Reasons for any delays in repairing the malfunction;
 - 7. Date the malfunction is repaired; and
 - 8. Where applicable, any alternative security measures that were taken.
 - 9. Information entered onto the log must be maintained for at least five (5) years

Section 7. Digital Surveillance System Standards.

- A. The digital Surveillance System must:
 - 1. Have dedicated cameras recorded at a minimum of 30 images per second (IPS) or frames per second (FPS), in real time;
 - 2. Produce visual resolution adequate to satisfy the sufficient clarity standards;
 - 3. Have adequate storage capacity to maintain all images obtained from the video cameras for at least seven (7) days;
 - 4. Have a failure notification system that provides audible and visual notification of any failure in the Surveillance System. Alternatively, a daily verification of the effective operation of the Surveillance System is acceptable; and
 - 5. The recording system for the Surveillance System will be designed and implemented with redundancy. Any point of failure will have immediate backed up so that no loss of recording will occur. This function will be tested annually.
- B. All digital video disks or other storage media produced from the Surveillance System must contain the data with the time and date it was recorded superimposed, the media player and the software necessary to view the recorded images, as well as a video verification encryption code (also known as a watermark).
- C. In the event of a total Surveillance System failure, the Gaming Enterprise and Surveillance Department shall strive to repair or replace the equipment as soon as possible following the loss of the system.
 - 1. A system failure requires immediate notification to the Director of Surveillance. Executive Director of the OGR&C, GRA Board, and General Manager shall be consulted to determine alternative additional security measures.
 - 2. An emergency action plan will be developed on responding to a total failure of the Surveillance System.
- D. Any significant changes or modifications of the Surveillance System require GRA Board approval prior to implementation. This includes, but is not limited to: major software or firmware upgrades, changes to the video management system, and



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installation or trial use of software or systems. Authority to temporarily approve changes in emergency situations is delegated to the Director of Surveillance and must be presented for GRA Board approval at the next available meeting.

History.

Approved by Band Assembly on November 10, 2005.

Changes approved by the GRA Board on September 11, 2007. Effective Date: September 11, 2007.

Changes approved by the GRA Board on November 4, 2010. Effective Date: November 4, 2010.

Changes approved by the GRA Board on September 1, 2011. Effective Date: September 1, 2011.

Changes approved by the GRA Board on August 30, 2016. Effective Date: August 30, 2016.

Changes approved by the GRA Board on August 30, 2016. Effective Date: August 30, 2016.

Prior versions of this Detailed Gaming Regulation are available upon request from the Gaming Regulatory Authority.