

TITLE X - SURVEILLANCE AND SECURITY REQUIREMENTS

PART I SURVEILLANCE.

- 10.01 Surveillance System. The surveillance system shall be operated by the NGRO. The Surveillance Department shall be responsible to:
- (1) Survey all areas and things required by these regulations to be under surveillance;
 - (2) Endeavor to detect illegal activities and instances of non-compliance with the requirements of the Compacts in the areas required by these regulations to be under surveillance;
 - (3) Endeavor to detect the presence in a Gaming Facility of Barred Persons and persons who are on the self-excluded list established under Arizona Compact Section 3(v)(2);
 - (4) Endeavor to detect gambling by persons who are less than twenty-one years of age;
 - (5) Endeavor to assist the Security Department in safeguarding people and assets in the areas required by these regulations to be under surveillance; and
 - (6) Satisfy the pertinent (i.e. surveillance) requirements of this Title and Arizona Compact Sections 3(b)(4), 3(t), and 11(b)(4).
- 10.02 The Surveillance System will be designed to meet the obligations of the Gaming Facility Operator or the NGRO relating to surveillance under this Title. The Surveillance System shall meet the requirements of this Title, the Arizona Compact and its Appendices, including Appendix H. The Surveillance System shall be operated in a manner that meets the surveillance standards of this Title, the Arizona Compact and its Appendices, including Appendix H.
- 10.03 Surveillance Plan. The Surveillance System shall be operated pursuant to a written surveillance plan (the "Surveillance Plan"). The then current Surveillance Plan shall be available in the main surveillance room for each Gaming Facility. At a minimum, the Surveillance Plan shall include:
- (1) An organizational chart depicting appropriate segregation of functions and responsibilities for all positions in the Surveillance Department;
 - (2) A description of the duties and responsibilities of each position shown on the organizational chart;
 - (3) A general description of the Surveillance System and all equipment used in the Surveillance system, including:

- (a) whether the system is digital or analog;
 - (b) the types, sizes, and quantities of monitors;
 - (c) the types and quantities of recorders, keyboards, and cameras;
 - (d) the types and quantities of quads and multiplexers; and
 - (e) the UPS system, backup generator, or alternate utility supplier;
- (4) A current, detailed blueprint or diagram that shows all of the areas of each Gaming Facility to be monitored by the Surveillance System (including the placement of Gaming Devices and Card Game Tables) and the placement of surveillance equipment in relation to the locations required to be observed by the Compact and its Appendices;
 - (5) A narrative description of the administrative and operational policies and procedures used in the operation of the Surveillance System (including the policies and procedures that implement the pertinent requirements of Arizona Compact Sections 3(b)(4), 3(t), and 11(b)(4));
 - (6) A description of the training required for Surveillance Department employees;
 - (7) If applicable, a statement that the Gaming Facility Operator does not conduct a form or forms of gaming permitted in the Compact;
 - (8) Any other information required by this Title;
 - (9) Identification of that department or part of the Gaming Facility Operator responsible for operating the Surveillance System, if the Gaming Facility Operator operates the Surveillance System;
 - (10) Identification of that department or part of the NGRO responsible for operating the Surveillance System, if the NGRO operates the Surveillance System; and
 - (11) Identification of the independent surveillance operator responsible for operating the Surveillance System, if an independent surveillance operator operates the Surveillance System.

10.04. Preparation and Approval of Surveillance Plan.

- (1) Gaming Facility Operator.

- (a) If the Gaming Facility Operator operates the Surveillance System, it shall prepare a Surveillance Plan and submit it to the NGRO for approval.
- (b) For Gaming Facilities not in operation at the time this Title becomes effective, the Gaming Facility Operator shall submit its Surveillance Plan to the NGRO for approval not later than five (5) days before starting to operate Class III Gaming or Card Game Tables. For Gaming Facilities already in operation at the time this Title becomes effective, the Gaming Facility Operator shall submit its Surveillance Plan to the NGRO for approval within ninety (90) days after the Title becomes effective. The Gaming Facility Operator may submit a Surveillance Plan to the NGRO in an electronic format.
- (c) If, after reviewing the Gaming Facility Operator's Surveillance Plan, the NGRO determines the Surveillance Plan does not comply with the requirements of this Title, the Arizona Compact and/or its Appendices, the NGRO shall notify the Gaming Facility Operator in writing of the reasons why the Surveillance Plan does not comply. In that case, the Gaming Facility Operator shall submit for approval a revised Surveillance Plan that complies with the requirements of this Title, the Arizona Compact and its Appendices within seven (7) days after receiving the NGRO's written notice or within such longer time as may be allowed by the NGRO.
- (d) If the Gaming Facility Operator operates the Surveillance System, it must amend its Surveillance Plan, and obtain the NGRO's approval of the amendments, before:
 - (i) Changing:
 - (A) the organizational chart for the Surveillance Department;
 - (B) the duties and responsibilities for any position shown on the organizational chart;
 - (C) the training required for Surveillance Department employees;
 - (D) the administrative or operational policies or procedures used in the operation of the Surveillance System;
 - (E) the types of games played; or
 - (F) the areas to be monitored by the Surveillance System;
 - (ii) Relocating equipment in, adding equipment to, or removing

equipment from, its Surveillance System (but not when replacing equipment with similar equipment of equal or greater functionality);

- (iii) Adding or relocating (but not replacing):
 - (A) a Card Game Table;
 - (B) a progressive Card Game Table;
 - (C) a keno area, a keno ball-drawing device, or random number generator for keno;
 - (D) a pari-mutuel area;
 - (E) a secured location for gaming chip inventories or card storage; or
 - (F) a Gaming Device requiring surveillance by a dedicated camera;
- (iv) Changing the location or layout of the cage and vault area or the areas where currency or coin may be stored or counted during the drop and count process; or
- (v) Changing the location of gaming machine booths and change banks (as defined in this Title), redemption booths, or automated redemption kiosks.
- (e) The Gaming Facility Operator shall submit an amended Surveillance Plan, or those portions of the Surveillance Plan amended (such as an updated blueprint or diagram), to the NGRO for approval at least forty-eight (48) hours before the time proposed for implementing the changes in the amendments, unless the NGRO agrees to a shorter notice. The Gaming Facility Operator may submit an amended Surveillance Plan, or those portions of the Surveillance Plan amended, to the NGRO in an electronic format. If changes to the Surveillance System are needed on an emergency basis, the Gaming Facility Operator may make those changes after obtaining the approval of the NGRO and notice is given to the State Gaming Agency, following which the Gaming Facility Operator shall promptly submit to the NGRO for approval an amended Surveillance Plan, or those portions of the Surveillance Plan amended (such as an amended blueprint or diagram), reflecting the changes. If, after reviewing proposed amendments to a Surveillance Plan, the NGRO determines the amendments would not comply with the requirements of this Title, the Arizona Compact and/or its Appendices, the NGRO shall notify the

Gaming Facility Operator in writing of the reasons why the amendments would not comply. In that case, the Gaming Facility Operator shall submit for approval an amended Surveillance Plan that complies, or those portions of the surveillance Plan amended that comply, with the requirements of this Title, the Arizona Compact and its Appendices within seven (7) days after receiving the NGRO's written notice or within such longer time as may be allowed by the NGRO.

(2) NGRO.

- (a) If the NGRO operates the Surveillance System, it shall prepare the required Surveillance Plan.
- (b) For Gaming Facilities not in operation at the time this Title becomes effective, the NGRO shall prepare its Surveillance Plan not later than five (5) days before the Gaming Facility Operator starts to operate Class III Gaming or Card Game Tables. For Gaming Facilities already in operation at the time this Title becomes effective, the NGRO shall prepare its Surveillance Plan within ninety (90) days after the Appendix becomes effective.
- (c) If the NGRO operates the Surveillance System, it shall prepare an amended Surveillance Plan before:
 - (i) Changing (or allowing changes to):
 - (a) the organizational chart for the Surveillance Department;
 - (b) the duties and responsibilities for any position shown on the organizational chart;
 - (c) the training required for Surveillance Department employees;
 - (d) the administrative or operational policies or procedures used in the operation of the Surveillance System;
 - (e) the types of games played; or
 - (f) the areas to be monitored by the Surveillance System;
 - (ii) Relocating equipment in, adding equipment to, or removing equipment from, its Surveillance System (but not when replacing equipment with similar equipment of equal or greater functionality);

- (iii) The Gaming Facility Operator adds or relocates (but not replaces):
 - (a) a Card Game Table;
 - (b) a progressive Card Game Table;
 - (c) a keno area, as keno ball-drawing device, or random number generator for keno;
 - (d) a pari-mutuel area;
 - (e) a secured location for gaming chip inventories or card storage; or
 - (f) a Gaming Device requiring surveillance by a dedicated camera;
- (iv) The Gaming Facility Operator changes the location or layout of the cage and vault area or the areas where currency or coin may be stored or counted during the drop and count process; or
- (v) The Gaming Facility Operator changes the location of gaming machine booths and change banks (as defined in Appendix H), redemption booths, or automated redemption kiosks.
- (d) If changes to the Surveillance System are needed on an emergency basis, the NGRO may make those changes after providing notice to the State Gaming Agency, if applicable, following which the NGRO shall promptly prepare an amended Surveillance Plan reflecting the changes.

10.05 Submission of Surveillance Plan to the State Gaming Agency – Arizona Only.

- (1) If applicable, the NGRO shall submit a copy of the initial Surveillance Plan for each Gaming Facility to the State Gaming Agency within forty-eight (48) hours after approving a plan received from the Gaming Facility Operator or, if the NGRO operates the surveillance system, within forty-eight (48) hours after preparing it. The NGRO may submit a Surveillance Plan to the State Gaming Agency in an electronic format. Within seven (7) days after receiving the initial Surveillance Plan from the NGRO, the State Gaming Agency shall review the Surveillance Plan. If the State Gaming Agency believes that the Surveillance Plan does not comply with the requirements of the Compact and/or its Appendices, the State Gaming Agency shall notify the NGRO in writing within that seven (7) day period of the reasons why the State Gaming Agency contends that the Surveillance Plan does not comply. If the State Gaming Agency does not object within the seven (7) day period, then the Surveillance Plan is deemed approved.

- (2) Within forty-eight (48) hours of approving any changes to the Surveillance Plan for a Gaming Facility, the NGRO shall submit to the State Gaming Agency an amended Surveillance Plan, or those portions of the Surveillance Plan amended (such as an updated blueprint or diagram), for the Gaming Facility. The NGRO may submit an amended Surveillance Plan, or those portions of the Surveillance Plan amended, to the State Gaming Agency in an electronic format. Within seven (7) days after receiving the amended Surveillance Plan, or those portions of the Surveillance Plan amended, from the NGRO, the State Gaming Agency shall review the amendments to the Surveillance Plan. If the State Gaming Agency believes that the amendments to the Surveillance Plan do not comply with the requirements of the Compact and/or its Appendices, the State Gaming Agency shall notify the NGRO in writing within that seven (7) day period of the reasons why the State Gaming Agency contends that the amendments do not comply. If the State Gaming Agency does not object within the seven (7) day period, then the amendments to the Surveillance Plan are deemed approved.
- (3) Any disputes regarding whether the initial Surveillance Plan or amendments to a Surveillance Plan comply with the requirements of the Compact or its Appendices shall be resolved in accordance with Compact Section 15.

10.06 Logs.

Surveillance logs required by this Title, the Arizona Compact and its Appendices may be kept in an electronic format.

10.07 Surveillance Personnel.

All Surveillance Department employees shall be at least eighteen (18) years of age.

10.08 Licensing and Certification.

All vendors providing goods or services in connection with surveillance at a Gaming Facility are providing those goods or services in connection with the operation of Class III Gaming in a Gaming Facility as contemplated by the Navajo Gaming Ordinance, 5 N.N.C. §§ 2017-18, Arizona Compact Section 2(r), and New Mexico Compact Section 5.A. All Surveillance Department employees shall be licensed and certified pursuant to Navajo Gaming Ordinance, 5 N.N.C. §§ 2019-20. Department employees who are not Enrolled Tribal Members shall be licensed and certified pursuant to Arizona Compact Section 5. All Surveillance Department employees who are Enrolled Tribal Members shall be licensed pursuant to Arizona Compact Section 5.

10.09 Access.

Agents of the NGRO shall be entitled to immediate access to the surveillance room and other surveillance areas. Agents of the State Gaming Agency shall be entitled to access the surveillance room and other surveillance areas in accordance with Arizona Compact

Section 7(a) and New Mexico Compact Section 4.E. The State Gaming Agency may not operate or maintain a surveillance room in a Gaming Facility nor access the signal from the Surveillance System. Agents of the State Gaming Agency shall have the right to inspect and copy during normal business hours records of the Surveillance Department in accordance with Arizona Compact Section 7(b) and New Mexico Compact Section 4.E.2(c).

10.10 Reserved.

10.11 Definitions.

Terms not defined in this Title that are defined elsewhere in the Regulations, Gaming Ordinance, Arizona Compact or its Appendices, or the New Mexico Compact shall have the meanings in those definitions. In addition, for purposes of this Title:

- (1) If the Gaming Facility Operator operates the Surveillance System, the term “Surveillance Department” shall mean that department or part of the Gaming Facility Operator responsible for operating the Surveillance System, as set forth in the Surveillance Plan.
- (2) If the NGRO operates the Surveillance System, the term “Surveillance Department” shall mean that department or part of the NGRO responsible for operating the Surveillance System, as set forth in the Surveillance Plan; and
- (3) Reserved.

10.12 Exceptions.

Gaming Facilities with annual gross gaming revenues less than \$2 million or the minimum for a Tier A facility under Title V or Title V(a), whichever is higher, are not required to regularly staff the surveillance room, and are also not required to have a UPS system, backup generator, or alternate utility supplier but otherwise must meet the requirements of this Title.

10.13 Minimum Internal Control Standards For Surveillance

- (a) The surveillance system shall be maintained and operated by the surveillance department from a staffed surveillance room and shall provide surveillance as required by the Compact and its Appendices.
 - (1) During Gaming Facility operating hours, the surveillance room must be staffed by at least one surveillance department employee trained in the use of the surveillance system. If a Gaming Facility is closed and in a locked down mode (*i.e.*, the facility is locked and no one is present in the facility), the surveillance room is not required to be staffed, but the surveillance system must be set to record overviews of the Gaming Facility. At all other times, the surveillance

room must be staffed by at least one surveillance department employee trained in the use of the surveillance system.

- (2) Notwithstanding the provisions of Subsection (a)(1), the surveillance room may be unstaffed for brief periods during Gaming Facility operating hours for reasons such as allowing surveillance room personnel to take meal breaks, to take other scheduled breaks, to use restroom facilities, to maintain the surveillance system, to review video, and/or to meet with others regarding surveillance-related matters. These periods may not be scheduled in a manner that creates a regular pattern allowing persons outside the surveillance room to ascertain when the surveillance room will be unstaffed.
 - (3) Notwithstanding the provisions of Subsections (a)(1) and (2), the surveillance room may be unattended in the event of an emergency requiring evacuation or closure of the surveillance room or if a scheduled surveillance employee(s) is not available for their shift. If an emergency or employee unavailability cause the surveillance room to be left unattended, the surveillance system shall be set to record overviews of the Gaming Facility, the surveillance department shall notify the NGRO immediately, and the surveillance room shall be staffed as soon as practicable.
 - (4) The surveillance system shall continuously record audio from the surveillance room and video of activities in the surveillance room.
- (b) The entrance to the surveillance room shall be located so that it is not readily accessible by either Gaming Facility employees who work primarily on the casino floor or the general public. The entrance to the surveillance room must be secured at all times, except during ingress and egress by authorized personnel.
 - (c) Access to the surveillance room shall be limited to surveillance department employees, other designated employees, and other persons authorized in accordance with the surveillance department policy, Appendix C of the Nation's Compact with the State of Arizona, and the Surveillance Plan. Such policy shall be approved by the NGRO. The surveillance department shall maintain a log of all persons entering the surveillance room. The log may be electronic, written, or a combination thereof. The surveillance department shall provide a copy of the log to the NGRO at least monthly, unless the NGRO requires the log to be provided more or less frequently. The surveillance department's policies and procedures shall prohibit the use of cellular telephones or radio equipment in the surveillance room, except as expressly authorized by those policies and procedures.
 - (d) Surveillance room equipment shall have total override capability over all surveillance equipment located outside the surveillance room.
 - (e) 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 necessary to record the cameras required by the standards in this section. Auxiliary or backup power sources such as a UPS system, a backup generator, or an alternate utility supplier satisfy this requirement.

- (f) The surveillance system shall have the capability to display the date and time of recorded events on video and/or digital recordings. Recordings of all cameras required by the standards in this section shall include the date and time (in 24 hour format), which shall not significantly obstruct the recorded view.
- (g) The surveillance department employees shall be trained in the use of surveillance equipment, knowledge of the games, and house rules.
- (h) The surveillance system shall be designed in a manner to prevent it from being readily obstructed, tampered with, or disabled by customers or employees. The surveillance system and each camera required by the standards in this section shall be installed in a manner that will prevent them from being readily obstructed, tampered with, or disabled by customers or employees. If the standards in this section require the use of a PTZ camera, the PTZ camera must be placed behind a smoked dome, one-way mirror, or similar material that conceals the camera from view, unless the design of the camera inherently conceals it from view.
 - (1) The policies and procedures of the Gaming Facility Operator and the surveillance department must prohibit employees from intentionally obstructing, tampering with, or disabling surveillance system equipment, excepting only surveillance department employees who have been authorized to disable surveillance system equipment for maintenance, relocation, removal, or the like.
 - (2) Each Gaming Facility must have lighting sufficient to permit clear video reproduction in the hard and soft count rooms, in the cages, in the vaults, and in the other locations set forth in Subsections (s), (t), and (u), in the surveillance room, and in all areas where class III games, including card games, are being operated.
- (i) The surveillance system shall be capable of displaying the image captured by any camera required by the standards in this section on a monitor and recording that image.
 - (1) Each surveillance room shall be equipped with at least one (1) video monitor that is at least 12-inches in size, which is capable of displaying the image captured by any camera required by the standards in this section, in accordance with the standards in this section for that camera.
 - (2) The surveillance system shall have video recorders that continuously record the images from all cameras required by the standards in this section, except for a brief time when tapes are being changed in analog video tape recorders. For each camera required by the standards in this section, the video recorders must be

capable of recording and playing back the image captured by that camera, in accordance with the standards in this section for that camera.

- (3) For surveillance systems using analog video tape recorders:
 - (i) The surveillance system shall have one (1) video recorder to record each camera that is both required by the standards in this section and:
 - (1) used for surveillance of class III gaming, including card games;
 - (2) located in the hard count room or soft count room;
 - (3) located in a cage, a vault, or another location set forth in Subsection (s), (t), and (u); or
 - (4) located in the surveillance room.
 - (ii) For all other cameras required by the standards in this section, the surveillance system shall record no more than four (4) cameras on any one (1) video recorder, whether recorded using quads, multiplexers, a combination of both, or otherwise.
- (4) For surveillance systems using digital video recorders, the digital video recorders shall have functionality that meets or exceeds that required by the standards in Subsections (i)(3)(i) and (ii).
- (j) The surveillance department shall make reasonable efforts to repair each malfunction of surveillance system equipment required by the standards in this section within seventy-two (72) hours after discovering the malfunction. The surveillance department shall notify the NGRO of each required camera that has malfunctioned for more than twenty-four (24) hours.
 - (1) If a malfunction in the surveillance system affects the ability to monitor or record the images from a camera required by the standards in this section, the Gaming Facility Operator or the surveillance department shall immediately provide alternative camera coverage, other surveillance measures, or other security measures, such as additional supervisory or security personnel, to protect the subject activity. If other security or surveillance measures are taken, the surveillance department shall promptly notify the NGRO.
 - (2) Reserved.
- (k) Reserved.

(1) Card games

The surveillance system shall monitor and record an overview of activities in each card game area, sufficient to allow the employees performing the different functions to be identified.

(1) At a minimum, the surveillance system shall provide one (1) dedicated camera for each card table and one (1) PTZ camera for every four (4) card tables. (This standard requires, for example, two (2) PTZ cameras for a Gaming Facility with five to eight card tables, three (3) PTZ cameras for nine to twelve card tables, etc.) If a Gaming Facility has fewer than four (4) card tables, the surveillance system shall provide, at a minimum, one (1) dedicated camera for each card table and at least one (1) PTZ camera for the card tables.

- (i) The required dedicated camera shall provide an overview of the card table under surveillance sufficient to allow the table surface, the table bank, the placement of wagers, and any shuffling device located at the table to be clearly viewed.
- (ii) The dedicated cameras and the PTZ camera(s) in combination must be capable of monitoring and recording the customers, dealer, card suits, card values, and game outcome, sufficient to allow them to be clearly identified.
- (iii) If any card games are serviced by a shuffling device that is not located at the table, then the remote shuffling device(s) shall be monitored and recorded by at least one dedicated camera providing a general overview of the shuffler sufficient to allow employees accessing the shuffler to be identified and their activities to be monitored and also sufficient to allow the movement of cards from the table to the shuffler and back to be monitored. This standard does not require one dedicated camera per remote shuffling device if one dedicated camera is able to provide the required coverage for more than one remote shuffling device.

(2) Gaming Chip Inventories.

The secure location in which unused and/or reserve gaming chip inventories for card games are maintained shall be monitored and recorded by at least one dedicated camera providing a general overview of the area, sufficient to allow employees accessing the inventories to be identified and their activities to be monitored. The surveillance department shall be notified before persons enter the secure location.

(3) Card Storage.

The secure location in which unissued playing cards for card games are maintained shall be monitored and recorded by at least one dedicated camera

providing a general overview of the area sufficient to allow employees accessing the inventories to be identified and their activities to be monitored. The surveillance department shall be notified before persons enter the secure location.

(m) Progressive card games

Surveillance of progressive card games shall meet the requirements of Subsection (l). In addition, a dedicated camera must record a clear view of the posted jackpot amount for each progressive card game. If several card games are linked to the same progressive jackpot meter, only one meter need be recorded.

(n) Keno

(1) The keno computer processing unit, or the entrance to the location where it is secured, shall be monitored and recorded by at least one dedicated camera, sufficient to allow persons in the area to be identified and their activities to be monitored. If keno numbers are not drawn by an electronic random number generator contained in the keno computer processing unit, the surveillance system shall possess the capability to monitor the keno ball-drawing device or random number generator, which shall be recorded during the course of the draw by a dedicated camera, sufficient to allow the balls drawn or numbers selected to be determined.

(2) A dedicated camera shall record one keno board during keno games, sufficient to allow the numbers displayed to be determined.

(3) Each keno ticket writer and cashier station shall be monitored and recorded by at least one dedicated camera, sufficient to allow persons in those areas to be identified and their activities to be monitored. This standard does not require one dedicated camera per ticket writer or cashier station if one dedicated camera is able to provide the required coverage for more than one ticket writer or cashier station.

(4) The surveillance system shall be capable of monitoring and recording general activities in each keno game area.

(o) Pari-mutuel

The surveillance system shall be capable of monitoring and recording general activities in each pari-mutuel area. Each pari-mutuel ticket writer and cashier station shall be monitored and recorded by at least one dedicated camera, sufficient to allow persons in those areas to be identified and their activities to be monitored. This standard does not require one dedicated camera per ticket writer or cashier station if one dedicated camera is able to provide the required coverage for more than one ticket writer or cashier station.

(p) Table games.

The surveillance system shall monitor and record an overview of activities in each table game area, sufficient to allow the employees performing the different functions to be identified.

- (1) At a minimum, the surveillance system shall provide one (1) dedicated camera for each table game and one (1) PTZ camera for every two (2) table games. (This standard requires, for example, two (2) PTZ cameras for a Gaming Facility with three or four table games, three (3) PTZ cameras for five or six table games, etc.) If a Gaming Facility has only one (1) table game, the surveillance system shall provide one (1) dedicated camera and one (1) PTZ camera for the table game.
 - (i) The required dedicated camera shall provide an overview of the table game under surveillance sufficient to allow the table surface, the table bank, the placement of wagers, and any shuffling device located at the table to be clearly viewed.
 - (ii) The dedicated camera and the PTZ cameras in combination must be capable of monitoring and recording the customers, dealer, card suits, card values, game outcome, and chip values (when stacks are broken down for payoff), sufficient to allow them to be clearly identified.
 - (iii) If any table games are serviced by a shuffling device that is not located at the table, then the remote shuffling device(s) shall be monitored and recorded by at least one dedicated camera providing a general overview of the shuffler sufficient to allow employees accessing the shuffler to be identified and their activities to be monitored and also sufficient to allow the movement of cards from the table to the shuffler and back to be monitored. This standard does not require one dedicated camera per remote shuffling device if one dedicated camera is able to provide the required coverage for more than one remote shuffling device.
 - (iv) In addition to the surveillance requirements for table games and progressive table games, if an approved table game utilizes any mechanical, electronic or electromechanical component, including meters, wheels, screens, and variable payout tables, such component(s) shall be monitored and recorded by at least one dedicated camera providing a view of the component sufficient to allow the display of, and outcome represented on, the component (if any). This standard does not require any dedicated cameras in addition those required by Subsections (p)(1)(i) if those cameras are able to provide the required coverage.

(2) Craps.

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

(3) 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.

(4) Big wheel.

All big wheel games shall have one (1) dedicated camera viewing the wheel.

(5) Gaming Chip Inventories.

The secure location in which unused and/or reserve gaming chip inventories for table games are maintained shall be monitored and recorded by at least one dedicated camera providing a general overview of the area sufficient to allow employees accessing the inventories to be identified and their activities to be monitored. The surveillance department shall be notified before persons enter the secure location.

(6) Card Storage.

The secure location in which unissued playing cards for table games are maintained shall be monitored and recorded by at least one dedicated camera providing a general overview of the area sufficient to allow employees accessing the inventories to be identified and their activities to be monitored. The surveillance department shall be notified before persons enter the secure location.

(q) Progressive table games

Surveillance of progressive table games shall meet the requirements of Subsection (p). In addition, a dedicated camera must record a clear view of the posted jackpot amount for each progressive table game. If several table games are linked to the same progressive jackpot meter, only one meter need be recorded.

(r) Gaming machines

The surveillance system must be capable of (i) monitoring, from various vantage points, all gaming machines in a Gaming Facility that are not monitored and recorded by dedicated cameras, (ii) providing overviews of the area(s) in which gaming machines are located, (iii) monitoring activities in the area(s) in which gaming machines are located, and (iv) allowing persons who are being tracked by surveillance to be identified as they

move through the areas in which gaming machines are located. The required coverage can be provided by dedicated cameras, PTZ cameras, or a combination of both, but, except as provided below, dedicated cameras are not required.

- (1) In-house progressive gaming machines. In-house progressive gaming machines offering a base payout amount (jackpot reset amount) of more than \$25,000 shall be monitored and recorded by at least one dedicated camera to provide coverage of:
 - (i) Persons at the gaming machine; and
 - (ii) The face of the gaming machine, sufficient to allow the payout line(s) of the gaming machine to be determined.
 - (2) Wide-area progressive gaming machines. Wide-area progressive gaming machines offering a base payout amount (jackpot reset amount) of more than \$200,000 and monitored by an independent vendor utilizing an on-line progressive computer system shall be monitored and recorded by at least one dedicated camera to provide coverage of:
 - (i) Persons at the gaming machine; and
 - (ii) The face of the gaming machine, sufficient to allow the payout line(s) of the gaming machine to be determined.
 - (3) Other Large Payout Gaming Machines. Except for in-house progressive gaming machines and wide-area progressive gaming machines, gaming machines offering a payout of more than \$75,000 shall be monitored and recorded by at least one dedicated camera to provide coverage of:
 - (i) Persons at the gaming machine; and
 - (ii) The face of the gaming machine, sufficient to allow the payout line(s) of the gaming machine to be determined.
 - (4) Multi-game gaming machines. The Gaming Regulatory Office, or the Gaming Facility Operator subject to the approval of the Gaming Regulatory Office, may develop and implement alternative procedures to verify payouts for multi-game machines in lieu of the surveillance that otherwise would be required by Subsection (r)(3)(ii).
 - (5) The coverage required in Subsections (r)(1) - (3) does not require one dedicated camera per gaming machine if one dedicated camera is able to provide the required coverage for more than one gaming machine.
- (s) Cage and vault

- (1) The surveillance system shall monitor and record, with at least one dedicated camera, a general overview of the activities occurring in each cage and vault area. The overview shall be sufficient to allow employees within the cage and vault areas to be identified and their activities to be monitored.
 - (2) The surveillance system shall monitor and record, with at least one dedicated camera, an overview of activities at the cage counters sufficient to allow persons at the cage counters to be identified and their activities to be monitored.
 - (3) Each cage cashier station shall be equipped with one (1) dedicated overhead camera covering the customer transaction area and all activity occurring in the customer transaction area.
- (t) Fills and credits
- (1) The cage or vault area in which fills and credits are transacted shall be monitored and recorded by at least one dedicated camera or motion activated dedicated camera that provides coverage sufficient to allow the chip values and the amounts on the fill and credit slips to be determined.
 - (2) Controls provided by a computerized fill and credit system may be deemed an adequate alternative to viewing the fill and credit slips.
- (u) Currency, coin, chips, and tokens
- (1) The surveillance system shall monitor and record all areas where currency, coin, chips, or tokens used for Class III gaming and owned by the Gaming Facility Operator are stored or counted sufficient to allow persons in those areas to be identified and their activities monitored. This provision does not apply to:
 - (i) Currency, coin, chips, or tokens that are not used for Class III gaming;
 - (ii) Areas that are the subject of specific surveillance requirements in this Title, including, but not limited to those areas addressed in Subsection (u)(2) and, in particular, Subsection (u)(2)(iii)(7);
 - (iii) Currency, coin, chips, or tokens inside Gaming Devices;
 - (iv) Imprest banks of cash maintained on the person of employees;
 - (v) Cash registers, including, but not limited to, those in hotels, restaurants, bars, gift shops, showroom box offices, child care facilities, bowling alleys, and other areas ancillary to Class III gaming;
 - (vi) Vending machines; and

- (vii) Tip jars and other tip storage areas.
- (2) Drop and Count Process.
- (i) The surveillance system shall monitor and record all areas where coin, chips, or tokens may be stored or counted during the drop and count process, 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, by either dedicated cameras or motion activated dedicated cameras, sufficient to allow persons in those areas to be identified and their activities to be monitored.
 - (ii) The surveillance system shall record audio from the soft count room.
 - (iii) The surveillance system shall provide for:
 - (1) Coverage of scales sufficient to view any attempted manipulation of the recorded data.
 - (2) Monitoring and recording of the table game drop box storage rack or area by either a dedicated camera or a motion activated dedicated camera, sufficient to allow persons in those areas to be identified and their activities to be monitored.
 - (3) [Reserved.]
 - (4) Monitoring and recording of all areas where the contents of table game drop boxes or bill acceptor canisters may be stored during the drop and count process, including the soft count room and all doors to the soft count room, by either dedicated cameras or motion activated dedicated cameras, sufficient to allow persons in those areas to be identified and their activities to be monitored.
 - (5) Monitoring and recording of all areas where currency is sorted, stacked, counted, verified, or stored during the soft count process by dedicated cameras, sufficient to allow persons in those areas to be identified and their activities to be monitored. The counting surface area must be continuously monitored and recorded by at least one dedicated camera, sufficient to allow persons in the area to be identified and their activities to be monitored during the soft count.
 - (6) Monitoring and recording an overview of activities at the currency counter and/or currency sorter, if the Gaming Facility Operator uses a currency counter or currency sorter in the soft count room,

by at least one dedicated camera, sufficient to allow persons in those areas to be identified and their activities to be monitored.

- (7) The capability of monitoring and recording an overview of the following, sufficient to allow persons involved to be identified and their activities to be monitored:
 - (a) fills or exchanges, as they are transferred from the cage to a card game, table game, or gaming machine;
 - (b) the drop, as it is transferred from card games, table games, or gaming machines to the count room; and
 - (c) credits as they are transferred from a card game or table game to the cage.

- (v) Gaming machine booths and change banks

The surveillance system shall monitor and record a general overview of the activities occurring in each gaming machine booth and change bank, each redemption booth, and each automated redemption kiosk with at least one dedicated camera, sufficient to allow persons in those areas to be identified and their activities to be monitored.

- (w) Video recording and/or digital record retention.

- (1) All video recordings and/or digital records of the images provided by the cameras required by the standards in this section shall be retained for a minimum of seven (7) days. If the NGRO or the State Gaming Agency requests that particular recordings be retained for a longer period of time, the surveillance department shall retain those recordings for the time requested. In the alternative, the surveillance department may provide the requesting entity with the original of an analog tape recording or a digital duplicate of a digital recording.
- (2) Recordings involving suspected or confirmed gaming crimes, unlawful activity, or persons detained in a security detention area must be retained for a minimum of thirty (30) days. If the NGRO or the State Gaming Agency requests that particular recordings be retained for a longer period of time, the surveillance department shall retain those recordings for the time requested. In the alternative, the surveillance department may provide the requesting entity with the original of an analog tape recording or a digital duplicate of a digital recording.
- (3) Duly authenticated copies of video recordings and/or digital records shall be provided to the Commission upon request. Duly authenticated copies of video recordings and/or digital records also shall be provided to the NGRO and/or the State Gaming Agency upon request. Each surveillance department shall be capable of promptly producing a clear still copy or photograph of a clear image

depicted on a video recording and/or digital record, using a video printer, still camera, or other comparable means.

- (4) Each Gaming Facility shall have a video monitor and a video player separate from the surveillance system at which the Gaming Regulatory Office, the State Gaming Agency, or other authorized persons may review video recordings and/or digital records.
- (x) Video library log
- (1) For a surveillance system with analog video tape recorders, the surveillance department shall maintain a log or logs of video recordings demonstrating compliance with the storage, identification, and retention standards required in this section. Video tapes shall be marked with a tape number or other identifying designation. The markings and/or log(s) shall allow the surveillance department to determine the date and time when each video tape was recorded, the camera or cameras recorded on the video tape, who placed the video tape in a video recorder, who removed the video tape from a video recorder, and who placed the video tape in the video tape storage area. The surveillance department also shall maintain a log or logs identifying any video tapes removed from the video tape storage area, who removed the video tape, why the video tape was removed, and when the video tape was returned.
 - (2) For a surveillance system with digital video recorders, the surveillance department shall maintain data demonstrating compliance with the storage, identification, and retention standards required in this Section. The data shall include the camera name or number and the date and time each recording was made. The data may be maintained in logs kept by the surveillance department, by the surveillance system, or a combination of both.
- (y) Malfunction and repair log
- (1) The surveillance department shall maintain a log or alternative procedure approved by the NGRO documenting 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, if applicable, any alternative security or surveillance measures that were taken.
- (z) Surveillance log
- (1) Surveillance department employees shall maintain a log of all surveillance activities, which shall be stored securely and which shall include, at a minimum:

- (i) The date;
 - (ii) The time surveillance was commenced and terminated;
 - (iii) The activity observed or performed (including any unusual occurrences and violations or suspected violations of the Compact or its appendices, including, but not limited to, the detection of illegal activities or suspected illegal activities, the detection of the presence in a Gaming Facility of Barred Persons or persons who are on the self-excluded list established under Section 3(v)(2) of the Nation's Compact with the State of Arizona, the detection of gambling by persons who were less than twenty-one years of age, the detention of persons, or injuries to a patron or employee); and
 - (iv) The name or license credential number of each person who initiates, performs, or supervises the surveillance.
- (2) Surveillance department employees also shall record a summary of the results of the surveillance of any suspicious activity. This summary may be maintained in a separate log.

(aa) Floor plan.

A floor plan of the Gaming Facility shall be available in the surveillance room. The floor plan shall show the location of and identify: (i) all gaming machines by device number; (ii) all table games and card games by table number; (iii) all gaming machine booths and change banks, redemption booths, and automated redemption kiosks; (iv) all security detention areas; (v) the location and layout of the cage and vault areas; (vi) the location and layout of areas required to be surveilled by Section (u); and (vii) the location of automatic teller machines. The floor plan also shall show the location of all surveillance cameras and audio recording devices. The floor plan shall be updated promptly with any changes to the location or layout of the foregoing items or areas.

(bb) Security Detention Areas.

The surveillance system must be capable of monitoring and recording, in both audio and video, all security detention areas. The video recording system must be sufficient to allow persons in the security detention area to be identified and their activities to be monitored. A notice must be posted in each security detention area advising all persons that the area may be under video and audio surveillance. When a person is detained in a security detention area, the surveillance department must continuously record, in both audio and video, the security detention area.

(cc) Entrances, exits, and other areas.

The NGRO, or the surveillance department as approved by the NGRO, shall establish and the surveillance department shall comply with standards for the surveillance of entrances

to and exits from each Gaming Facility and the grounds adjacent to each Gaming Facility, including parking lots adjacent to the Gaming Facility primarily used by patrons or employees of the Gaming Facility. Those standards, at a minimum, shall require:

- (1) The surveillance department to monitor and record each public entrance to, and public exit from, the Class III gaming areas in each Gaming Facility with at least one (1) dedicated camera, sufficient to allow persons using those entrances and exits to be distinguished. (A combination entrance/exit will require only one dedicated camera.);
- (2) The surveillance department to be capable of monitoring and recording all other entrances to, and all other exits from, each Gaming Facility sufficient to allow persons using those entrances and exits to be distinguished;
- (3) The surveillance department to be capable of monitoring and recording overviews of the grounds adjacent to each Gaming Facility, including parking lots adjacent to the Gaming Facility primarily used by patrons or employees of the Gaming Facility; and
- (4) The surveillance department to continuously record the images from all cameras required to meet the standards required by Subsection (cc), except for a brief time when tapes are being changed in analog video tape recorders.

(dd) Supplemental surveillance

A Gaming Facility may have supplemental surveillance systems, not operated by the surveillance department, providing surveillance in addition to that required of the surveillance system under this Title. Supplemental surveillance systems are not subject to the requirements of Appendix C of the Nation's Compact with the State of Arizona or this Title.

PART II. SECURITY.

10.14 Security Department.

The Gaming Facility Operator shall have a Security Department responsible for the overall security of each Gaming Facility. The Security Department will, in accordance with the Security Plan:

- (1) Assist with the enforcement of applicable laws;
- (2) Reasonably endeavor to protect the physical safety of people lawfully at each Gaming Facility;
- (3) Physically safeguard the Gaming Facility Operator's assets transported between the gaming floor and the cashiers' cage department;

- (4) Endeavor to protect the property of the Gaming Facility Operator and its patrons from illegal activity;
- (5) Be responsible for detaining, or assisting in the detention of, persons who may be involved in illegal acts for the purpose of notifying appropriate law enforcement or gaming regulatory authorities;
- (6) Endeavor to prevent gambling by persons who are less than twenty-one years of age;
- (7) Endeavor to identify, and remove from Gaming Facilities, Barred Persons and persons who are on the self-excluded list established under Arizona Compact Section 3(v)(2); and
- (8) Satisfy the pertinent (i.e. security) requirements of Arizona Compact Sections 3(t), 3(v)(2)(G), 6(b), 6(e), and 11(b)(4).

10.15 Security Plan.

The Gaming Facility Operator shall prepare a written casino security plan (the “Security Plan”) for each Gaming Facility. The Security Plan shall be designed to meet the Gaming Facility Operator’s obligations relating to security under this Title. At a minimum, the Security Plan shall include:

- (1) An the organizational chart depicting appropriate segregation of functions and responsibilities for all positions in the Security Department;
- (2) A description of the duties and responsibilities of each position shown on the organizational chart;
- (3) A narrative description of the administrative and operational policies and procedures used in Security Department (including, if applicable, the policies and procedures that implement the pertinent requirements of Arizona Compact Sections 3(t), 3(v)(2)(G), 6(b), 6(e), and 11(b)(4));
- (4) A description of the training required for security personnel;
- (5) The location of each security detention area;
- (6) Any other information required by this Appendix;
- (7) Identification of that department or part of the Gaming Facility Operator responsible for Gaming Facility security in the case of Tier B and C Gaming Facilities; and
- (8) For all other Gaming Facilities, identification of the person(s), position(s),

department, or part of the Gaming Facility Operator responsible for Gaming Facility security.

The Gaming Facility Operator shall operate its Security Department in accordance with the Security Plan and the requirements of this Title, Arizona Compact and its Appendices.

10.16 Preparation and Approval of Security Plan.

- (1) The Gaming Facility Operator shall prepare a Security Plan and submit it to the NGRO for approval. The Gaming Facility Operator shall amend the Security Plan as needed to keep it current.
- (2) For Gaming Facilities not in operation at the time this Title becomes effective, the Gaming Facility Operator shall submit its Security Plan to the NGRO no later than five (5) days before starting to operate Class III Gaming or Card Game Tables. For Gaming Facilities already in operation at the time this Title becomes effective, the Gaming Facility Operator shall submit its Security Plan to the NGRO within ninety (90) days after this Title becomes effective. The Gaming Facility Operator shall submit each amended Security Plan (or those portions of the Security Plan amended) to the NGRO approval. The Gaming Facility Operator shall submit an amended Security Plan, or those portions of the Security Plan amended, to the NGRO for approval at least forty-eight (48) hours before the time proposed for implementing the changes in the amendments, unless the NGRO agrees to a shorter notice. The Gaming Facility Operator may submit an amended Security Plan, or those portions of the Security Plan amended, to the NGRO in an electronic format. If changes to the Security Plan are needed on an emergency basis, the Gaming Facility Operator may make those changes after obtaining the approval of the NGRO and, if applicable, notice is given to the State Gaming Agency, following which the Gaming Facility Operator shall promptly submit to the NGRO for approval an amended Security Plan, or those portions of the Security Plan amended, reflecting the changes.
- (3) If, after reviewing the Gaming Facility Operator's Security Plan or an amended Security Plan, the NGRO determines the plan does not comply with the requirements of this Title, the Arizona Compact and/or its Appendixes, the NGRO shall notify the Gaming Facility Operator in writing of the reasons why the plan does not comply. In that case, the Gaming Facility Operator shall submit for approval a revised Security Plan that complies with the requirements of the Compact and its Appendixes within seven (7) days after receiving the NGRO's written notice or within such longer time as may be allowed by the NGRO.

10.17 Submission of Security Plan to the State Gaming Agency – Arizona Only.

- (1) If applicable, the NGRO shall submit a copy of the initial Security Plan for each Gaming Facility to the State Gaming Agency within forty-eight (48) hours after approving a plan received from the Gaming Facility Operator. The NGRO may submit a Security Plan to

the State Gaming Agency in an electronic format. Within seven (7) days after receiving the initial Security Plan from the NGRO, the State Gaming Agency shall review the Security Plan. If the State Gaming Agency believes that the Security Plan does not comply with the requirements of the Compact and/or its Appendices, the State Gaming Agency shall notify the NGRO in writing within that seven (7) day period of the reasons why the State Gaming Agency contends that the Security Plan does not comply. If the State Gaming Agency does not object within the seven (7) day period, then the Security Plan is deemed approved.

- (2) Within forty-eight (48) hours of approving any changes to the Security Plan for a Gaming Facility, the NGRO shall submit to the State Gaming Agency an amended Security Plan, or those portions of the Security Plan amended, for the Gaming Facility. The NGRO may submit an amended Security Plan, or those portions of the Security Plan amended, to the State Gaming Agency in an electronic format. Within seven (7) days after receiving the amended Security Plan, or those portions of the Security Plan amended, from the NGRO, the State Gaming Agency shall review the amendments to the Security Plan. If the State Gaming Agency believes that the amendments to the Security Plan do not comply with the requirements of the Compact and/or its Appendices, the State Gaming Agency shall notify the NGRO in writing within that seven (7) day period of the reasons why the State Gaming Agency contends that the amendments do not comply. If the State Gaming Agency does not object within the seven (7) day period, then the amendments to the Surveillance Plan are deemed approved.
- (3) Any disputes regarding whether the initial Security Plan or amendments to a Security Plan comply with the requirements of the Compact or its Appendices shall be resolved in accordance with Arizona Compact Section 15.

10.18 Security Detention Area.

Each Gaming Facility shall have at least one security detention area that meets the requirements of the Compact and its Appendices. A security detention area is an area designated and used for the detention of persons by the Gaming Facility Operator and/or the Tribal Gaming Office. A security detention area either may be: (i) an area used exclusively for the detention of persons; or (ii) an area used for the detention of persons as well as for other purposes. Gaming Facilities with annual gross gaming revenues less than \$2 million or the minimum for a Tier A facility under Title V, whichever is higher, are not required to have a security detention area.

10.19 Reports.

The Security Department shall prepare a legible report regarding each incident observed by or reported to a Security Department employee:

- (1) known by the Security Department employee to involve a violation or suspected violation of the Arizona Compact, its Appendices, the New Mexico Compact, or the Nation's Gaming Ordinance; or

- (2) involving an unusual occurrence, including, but not limited to:
 - (a) criminal conduct or suspected criminal conduct;
 - (b) injuries to a patron or employee;
 - (c) gambling or attempts to gamble by persons under the age of twenty-one;
 - (d) the detention of persons; or
 - (e) Barred Persons and persons who are on the self-excluded list established under Arizona Compact Section 3(v)(2) who have entered a Gaming Facility or who have attempted to enter a Gaming Facility.
- (3) Each report shall be prepared within a reasonable time after the incident, and shall include the name of the person preparing the report, the date and time of the incident, the names of the security personnel present, the nature of incident, the names of the persons involved (if available), and the names of any witnesses (if available). Security reports required by the Compact and its Appendices may be kept in an electronic format.

10.20 Security Personnel.

All employees of the Security Department shall be at least eighteen (18) years of age.

10.21 Definitions.

Terms not defined in this Title that are defined elsewhere in the Regulations, Gaming Ordinance, Arizona Compact or its Appendices or New Mexico Compact shall have the meanings in those definitions. In addition, for purposes of this Title:

- (1) For a Tier B or Tier C Gaming Facility, the term “Security Department” shall mean that department or part of the Gaming Facility Operator responsible for Gaming Facility security, as set forth in the Security Plan.
- (2) For all other Gaming Facilities, the term “Security Department” shall mean the person(s), position(s), department or part of the Gaming Facility Operator responsible for Gaming Facility security, as set forth in the Security Plan.