

MISSOURI GAMING COMMISSION  
MINIMUM INTERNAL CONTROL STANDARDS  
CHAPTER M – SURVEILLANCE

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*Note: Sections 313.800 through 313.850, RSMo, et seq., and Title 11, Division 45 of the Code of State Regulations establish standards to which Class B licensees must comply. Class B licensees should review these statutes and rules to ensure their ICS includes compliance with the requirements set forth. Revised January 30, 2011. Revised August 30, 2014 (revised 1.02, 3.01; deleted 4.04). Revised January 30, 2017 (revised Section 1.06).*

**MINIMUM INTERNAL CONTROL STANDARDS**  
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**(11 CSR 45-7)**

**§ 1    **General****

- 1.01    Closed circuit surveillance systems and surveillance coverage shall continuously comply with all requirements of 11 CSR 45-7 and the MICS.
- 1.02    The Surveillance Department shall be independent of all other departments. The Surveillance Director shall report directly to an organizational level above that of General Manager.
- 1.03    Unless otherwise specifically authorized by MGC, only Surveillance and MGC personnel shall be permitted direct or indirect control, use of, or access to Surveillance Department camera systems. Security may operate a closed circuit television (CCTV) system to monitor non-gaming areas. Surveillance may have access or override authority for Security’s CCTV. However, Security shall not have access to the gaming system operated by Surveillance.
- 1.04    The General Manager may have a surveillance monitor and related equipment necessary to select and direct various Surveillance Department cameras; however, both the Surveillance Department and MGC shall be able to override the controls in the General Manager’s office. The General Manager shall not have the capability to monitor any camera inside the Surveillance Department. A video recorder shall be maintained by the Surveillance Department that records all video displayed on the General Manager’s monitor. Video recordings from the General Manager’s recorder shall be maintained by the Surveillance Department for at least 30 days and be immediately available to any Commission agent upon request.
- 1.05    Surveillance personnel shall have no other gaming related duties within the riverboat gaming operation. (11 CSR 45-7.050(1)(C))
- 1.06    Surveillance personnel shall possess, but are not required to display, a valid riverboat-issued casino access badge and a commission-issued occupational license badge while on property. Surveillance personnel shall still comply with 11 CSR 45-5.030 which prohibits employees from playing any gambling game on the premises.
- 1.07    A copy of the current casino floor plan showing the placement of all surveillance cameras shall be provided for the MGC surveillance room within 24 hours of any change.
- 1.08    All required dedicated camera coverage shall remain in the MGC approved position. When changes to required dedicated camera coverage are needed, the MGC boat agent on duty shall approve the new coverage prior to use.

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**§ 2 Surveillance Requirements**

- 2.01 Surveillance coverage of slot machines shall provide sufficient clarity to read both the asset number and game outcome with the same camera.
- 2.02 Surveillance coverage of table games and poker shall meet the following standards:
- (A) Fixed cameras shall provide views that enable a layperson to clearly determine table number, chip values, cash denominations, card values (including pips, face cards [K, Q or J] and, if relevant, suits), and game outcome (e.g., ability to reconstruct hands) excluding dice values on craps tables. Dedicated coverage of the game outcome on table games is only required for games which do not have an automated game history that records at least the last 50 rounds of play;
  - (B) Table bank trays, betting areas and card placement shall be continuously covered. Rail-to-rail fixed coverage is not required;
  - (C) Player's and Dealer's hands shall be recorded by Surveillance anytime the person's hands touch cards, chips in the betting area, or the chip tray. If table size or field of view is such that one fixed camera cannot provide the required coverage, whatever number of cameras needed to meet the coverage requirements shall be used;
  - (D) If PTZ cameras are used to provide the required continuous coverage, they shall be locked in position dedicated to that location and shall function as a fixed camera; and
  - (E) Any signage displaying the value of a progressive or bad beat award shall have dedicated coverage.
- 2.03 Surveillance coverage in the cage shall be recorded with sufficient clarity to identify all paperwork and the denomination of chips and currency.
- 2.04 Surveillance coverage of the entry and exit turnstile areas shall be sufficiently clear to permit verification of admission counts and identification of persons.
- 2.05 Panic alarms shall be audible in Surveillance.

**§ 3 Surveillance Room Access and Control**

- 3.01 Unless otherwise specifically authorized by MGC, access to the surveillance room is restricted to Surveillance and MGC personnel. Any other person needing access to the surveillance room shall obtain prior permission of the MGC and their access shall be recorded on a Surveillance Ingress/Egress Log. (11 CSR 45-7.050)

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- 3.02 The MGC Boat Supervisor shall be notified prior to internal or external auditors accessing the surveillance room. Auditor access shall be limited to the following:
- (A) Internal Audit may access the surveillance room to perform audit work up to 30 hours per calendar quarter; and
  - (B) External Audit personnel may access the surveillance room to perform audit work up to 15 hours per calendar quarter.
- 3.03 The surveillance equipment in the MGC surveillance room shall be able to monitor and record without being overridden. Only MGC personnel shall have the ability to monitor the camera(s) required by 11 CSR 45-7.050 installed in the casino surveillance room.

**§ 4 Operations**

- 4.01 Describe in the Internal Control System the procedures to be followed by surveillance personnel during their shift including:
- (A) inspection of equipment;
  - (B) testing procedures of equipment;
  - (C) video recording media maintenance;
  - (D) retention and release of video recordings; and
  - (E) preparation of shift logs, incident reports, and other forms.
- 4.02 Surveillance personnel shall video record in its entirety and continuously monitor all drops and counts, including drops and counts of pooled dealer, cage cashier and slot attendant tips.
- 4.03 A Surveillance Release Log shall be maintained recording who receives a copy of video recordings. Video recordings of criminal or regulatory investigations or violations shall not be released to anyone without the approval of an MGC agent.
- 4.04 At least three Surveillance personnel per excursion gambling boat shall be on duty in the surveillance room actively monitoring gaming activities when gaming, drops, or counts are being conducted. Additional personnel shall be available to provide required live observation and other duties and to allow for meals and breaks.
- 4.05 Whenever panic alarms are activated the MGC boat agent on duty and Security shall be notified. Tests of all panic alarms shall be conducted by Surveillance at least once each calendar month and documented in the Surveillance Shift Log.

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**§ 5 Records** (11 CSR 45-7.070)

5.01 A Surveillance Shift Log shall:

- (A) be continuously maintained by Surveillance personnel;
- (B) be chronological;
- (C) include entries for:
  - (1) the notification of any maintenance or repair of any gaming device or money handling equipment;
  - (2) gaming table drop box exchanges;
  - (3) any detention or questioning of patrons or employees by the Security department, including the identity of:
    - (a) the patrons or employees; and
    - (b) the Security personnel involved;
  - (4) the beginning, end, and any interruptions of all required drop and count processes, specifying which drop or count is being conducted (including emergency drops);
  - (5) any observed procedural or Internal Control violations;
  - (6) any observed criminal activity;
  - (7) any surveillance conducted on anyone or any activity that appears:
    - (a) to be abnormal, irregular, illegal or an emergency; or
    - (b) to violate the rules of the commission;
  - (8) any surveillance conducted at the request of:
    - (a) an employee of the Class B Licensee; or
    - (b) a commission agent;
  - (9) all persons reviewing surveillance recordings;
  - (10) all persons entering and exiting the Surveillance room, excluding surveillance personnel and MGC personnel;
  - (11) all surveillance personnel entering and exiting the Surveillance room only at the beginning and ending of their shifts; and
  - (12) any other notations deemed necessary by Surveillance personnel or the commission to ensure compliance with the statutes, regulations, and MICS;
- (D) be provided to the MGC Boat Supervisor daily; and
- (E) be retained for at least one (1) year.

5.02 A Surveillance Incident Report shall:

- (A) be made by the person responsible for monitoring the activity;
- (B) contain details of any incident observed that involved abnormal or criminal activity;
- (C) be provided to the MGC Boat Supervisor daily; and
- (D) be retained a minimum of one (1) year.

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- 5.03 All Surveillance department video recordings, logs, and reports shall: (11 CSR 45-7.080)
- (A) be retained in a manner to allow them to be easily retrieved by date; and
  - (B) be furnished to any MGC agent immediately upon request.

**§ 6 Chain of Evidence**

- 6.01 Include in the Internal Control System the procedures for maintaining, copying and releasing any video recordings which contain suspected illegal activities or violations of regulations, MICS, or internal controls. Ensure the MGC boat agent on duty is notified immediately of suspected illegal activity and of the video recording's existence.

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