

GAMING COMMISSION REGULATIONS
ESTABLISHING GAMING COMMISSION/
SURVEILLANCE INTERFACE REQUIREMENTS

**Coyote Valley Gaming Commission
Coyote Valley Band of Pomo Indians**

Chapter 14

GAMING COMMISSION/SURVEILLANCE INTERFACE REQUIREMENTS

Sections:

- 14.010 Initiation of Surveillance Tape Review Activities.
- 14.020 Documentation of Reviews of Surveillance Tapes.
- 14.030 Contents of Surveillance Tape Review.
- 14.040 Distribution of Reports.
- 14.050 Confidentiality.
- 14.060 Surveillance Protocols.
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14.010 Initiation of Surveillance Tape Review Activities. The Director, Surveillance Room, shall perform surveillance activities under this Chapter when:

1. There is a customer complaint to the Casino;
2. There is an accounting variance that is reported by the Accounting Department;
3. There is a possible theft by a patron or employee;
4. There is suspicious activity indicating the presence of drug dealing, illegal currency transactions, or collusion between an employee and a patron, or between employees, or between patrons concerning the suspicious activity;
5. There is an observation by an inspector employed by the Gaming Commission who has reported a possible violation or any suspicious activity to personnel in the Surveillance Department;
6. Request by the Gaming Commission concerning a specific incident. Such request shall include sufficient information to allow the Surveillance Department to know what to look for in a Surveillance Tape Review; or
7. Request by the Tribal Police Department in connection with an investigation of a possible crime.

14.020 Documentation of Reviews of Surveillance Tapes. Every Review, and every Request for such Review shall be documented by the Surveillance Department and recorded under the procedures in this Chapter. Every Request shall be documented in a log book, and if the Director, Surveillance Department decides for any reason that a Review is not warranted, the

reason for such decision shall be clearly stated in the log book.

14.030 Contents of Surveillance Tape Review. A Surveillance Tape Review shall consist of the following steps:

1. Surveillance Department Informational Report. A Surveillance Tape Review shall be initiated when the Informational Report is completed by the Surveillance Room or when there is a request to do so from the Gaming Commission or another official who is authorized to make such request. The Report shall include the following information:
 - (a) Date,
 - (b) Author (From: line on memo),
 - (c) Subject,
 - (d) Cameras involved,
 - (e) Violation # (a number assigned by the Surveillance Department for tracking and record keeping purposes), and
 - (f) Body of the report.
2. Surveillance Tape Review. The information from the Surveillance Department Information Report shall be incorporated into a Surveillance Tape Review form that is on the Surveillance Room computer system or recorded manually. The information on the form shall consist of:
 - (a) Date of the Review;
 - (b) Time as expressed on a 24-hour clock;
 - (c) Identification of the Department requesting the Review;
 - (d) Manager or Supervisor's name of the requesting Department;
 - (e) Date of the incident;
 - (f) Time of the incident expressed on a 24-hour clock;
 - (g) Location of the incident;
 - (h) Report reference or Incident Number which shall be the reference number of the requesting Department for cross-reference purposes;
 - (i) Cash shortage (amount involved) where there is a reported shortage;
 - (j) Description of the circumstances involved and the time at which the Surveillance Department was notified;
 - (k) Review start time on the Surveillance tape as expressed on the Surveillance clock and times of subsequent observations and descriptions

of such observations;

(l) Notification of the Gaming Commission and the time of such notification, and whether the Gaming Commission requested a duplicate tape of the incident;

(m) Time at which the Review stopped and whereabouts of the parties under observation at the end of the Review;

(n) Time and circumstances of departures from the Casino of any parties under observation; and

(o) Time at which Surveillance notified the Gaming Commission of the incident and review results. If a duplicate tape prepared, the number of such tape.

3. Surveillance Department Information/Observation Report. This Report is the final version of the information compiled under Paragraph 2 of this Section. The Information/Observation Report shall:

(a) Be in a memorandum format, the heading of which shall contain:

(1) Date;

(2) Name of the person to whom the Report is directed (“To” line);

(3) Author of the Report (“From” line);

(4) To whom copies are directed (“Cc: line”); and

(5) Surveillance log number and general subject matter, (“Sv line”, Surveillance number and general subject matter, e.g., “Suspected theft”).

(b) Be reviewed for accuracy and completeness by the initial author, as well as a second employee, each of whom shall initial each page;

(c) Be signed on each page by the Supervisor of the Surveillance Department;

(d) Show on the bottom of each page:

(1) That the Report is “Confidential” and

(2) Surveillance number (Surveillance Department assigned number);

(e) Contain only information which is generated either by the Surveillance Tape Review or which is provided by the Gaming Commission or other authorized requester. The Surveillance Department shall not otherwise gather information from other Departments within the Casino to include in a Surveillance Report. It shall be the responsibility of the requester to

supply the Surveillance Department with information that is sufficient to allow the Surveillance Department to prepare a Surveillance Report that meets the needs of the requester;

(f) Contain a list of all attachments. The original with all the attachments shall remain in the Surveillance Department, unless the person to whom the Report is directed requests specific items; and

(g) Be timely. The Director, Surveillance Department shall ensure that each Surveillance Report is finalized within seven (7) days of the initial request by the Gaming Commission or other authorized requester. When there is a shortage of staff or other reason that the seven-day deadline cannot be met, the Director, Surveillance Department shall notify the Chair of the Gaming Commission of the delay and the date on which the finalized Surveillance Report shall be transmitted to the Gaming Commission.

14.040 Distribution of Reports.

1. When a Surveillance Review is requested by the Gaming Commission a copy the Surveillance Report shall be distributed in a sealed envelopes and marked “Confidential” and addressed to:
 - (a) The Chair, Gaming Commission; and
 - (b) The General Manager of the Casino where appropriate.
2. When a Surveillance Review is initiated by the Surveillance Department due to an observation by the Surveillance Room personnel, the Surveillance Department shall forward the Surveillance Report, marked “Confidential” to the Chair of the Gaming Commission.
 - (a) Where the Surveillance Report contains information that would tend to indicate employee theft, the Chair of the Gaming Commission shall immediately forward a complete copy of the Surveillance Report to the Manager of the Casino and the Internal Auditor unless a disclosure of the information in the Surveillance Report would compromise an ongoing investigation by the Gaming Commission or the Tribal Police Department.
 - (b) Where the Surveillance Report contains information that would tend to indicate that a crime has been committed, the Surveillance Department shall forward the Report to the Gaming Commission and a copy to the Chief of the Coyote Valley Tribal Police.
3. When a Supervisor requests a Surveillance Report, such request must first be approved by the Department Manager who will review any such request to assure that the Surveillance Report will be used solely for an authorized purposes and not otherwise.
4. When requested by the Chief, or authorized tribal police officer, the Surveillance Department shall prepare a Surveillance Report for use by the Tribal Police Department.

5. Method of Distribution:

(a) To the Gaming Commission, copies of Reports shall be delivered in person.

(b) To the Coyote Valley Tribal Police, the Surveillance Department shall notify the Police Department by telephone that a Report is available, and request that it be picked up by a Tribal Police Officer.

(c) Acknowledgment by Receipt.

(1) The person delivering the copy of the Report shall request that the person named under 5(a) above, or a designated employee, sign a receipt that has the date, time of delivery and the signature of the person accepting delivery.

(2) Where the Tribal Police Officer picks up the Report, the Officer who picks up the Report shall sign a receipt.

(3) Where the Report is mailed, the Surveillance Department shall require a receipt showing the signature of the recipient and the date and time of such receipt.

(d) Receipt Retention. The receipt(s) shall be kept with the permanent copy of the Report in the Surveillance Department.

14.050 Confidentiality.

1. The Surveillance Department shall not disclose the contents of a Surveillance Tape Review or of a Report except as permitted under this Chapter. The Surveillance Department personnel shall not discuss the contents of any Tape Review or Report except as permitted in this Chapter. If requested to disclose any part of the contents of a Tape Review or Report, the person to whom the request is made shall immediately report such request to the Director, Surveillance Department who shall take appropriate action to ensure that the requester is made aware of the disclosure restrictions under this Chapter.
2. The Gaming Commission shall ensure that any Reports received under this Chapter shall remain confidential except to the extent necessary for enforcement purposes, pursuant to a subpoena in litigation, license suspension hearings, disciplinary proceedings, or when requested by authorized personnel of the National Indian Gaming Commission, or the California Gambling Control Commission.

14.060 Surveillance Protocol.

1. The Surveillance Department shall establish minimum staffing levels based on the number of cameras one surveillance employee shall monitor simultaneously. Such staffing levels shall be approved by the Gaming Commission.
2. The Surveillance Department shall establish rules, which shall be approved by the

Gaming Commission, for employees while they are engaged in monitoring. Such rules shall include a prohibition on (a) conversation that is not related to the ongoing monitoring; (b) listening to the radio, I-pod, computer sound system, or other mp3 device; (c) conversation on a cell phone for non-emergency purposes; (d) texting, or (e) any other activity that would distract Surveillance Department personnel during the performance of their duties.

3. Surveillance Department employees shall not fraternize with any Casino employee, patron, or visitor while on duty, including, but not limited to, utilizing the Casino employee break or lunch room.

14.070 Access to Surveillance Department.

1. The Surveillance Department personnel shall not allow anyone access to the Surveillance Room unless such person has the written permission of the Gaming Commission for such access.
2. The Gaming Commissioners and inspectors shall have access to the Surveillance Room at any time for any lawful purpose, including but not limited to: (a) check camera coverage; (b) observe licensees in the performance of their duties; (c) observe surveillance personnel to check for compliance with regulations and minimum internal controls (“MICs”), and (d) inspect Surveillance Department records, tapes, and monitors.
3. The General Manager of the Casino may, with the approval of the Gaming Commission, which approval shall not be unreasonably withheld, unless, in the sole discretion of the Commission, such access would interfere with Surveillance Department personnel performing their duties, have access to the Surveillance Department for the purpose of: (1) reviewing a surveillance tape for which an incident report was generated, and (2) to observe Casino employees in the performance of their duties.

CERTIFICATION

The foregoing Regulations were adopted at a regular meeting of the Coyote Valley Gaming Commission held on the ____ day of December, 2008, by the following vote:

AYES:
NOES:
ABSTAIN:
ABSENT:

Chair, Coyote Valley Gaming Commission

ATTESTED:

Secretary, Coyote Valley Gaming Commission