United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, D.C. 20240

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NATIONAL INDIAN GAMING COMMISSION

Honorable Jeff C. Mitchell
Chairman
The Klamath Tribes
P.O. Box 436
Chiloquin, Oregon 97624

Dear Chairman Mitchell:

On April 4, 1997, we received Amendment III to the Tribal-State Compact for regulation of Class III gaming between The Klamath Tribes (Tribe) and the State of Oregon (State), dated December 19, 1996. We have completed our review of this Amendment and conclude that it does not violate the Indian Gaming Regulatory Act of 1988 (IGRA), Federal law, or our trust responsibility. Therefore, pursuant to my delegated authority and Section 11 of the IGRA, we approve the Amendment. The Amendment shall take effect when the notice of our approval, pursuant to Section 11(d)(3)(B) of IGRA, 25 U.S.C. § 2710(d)(3)(B), is published in the FEDERAL REGISTER.

We wish the Tribe and the State success in their economic venture.

Sincerely,

/S/ Ada E. Deer

Ada E. Deer
Assistant Secretary - Indian Affairs

Enclosure

Identical Letter Sent to: Honorable John Kitzhaber
Governor of Oregon
254 State Capitol
Salem, Oregon 97310

cc: Portland Area Director w/copy of approved Amendment
Supt., Chiloquin Sub-Agency w/copy of approved Amendment
National Indian Gaming Commission w/copy of approved Amendment
Pacific NW Regional Field Solicitor w/copy of approved Amendment
Portland United States Attorney w/copy of approved Amendment

TRIBAL-STATE COMPACT FOR REGULATION OF CLASS III GAMING BETWEEN THE KLAMATH TRIBES AND THE STATE OF OREGON

AMENDMENT III

This amendment is made to the Class III Gaming Compact between the Klamath Tribes and the State of Oregon executed on December 16 1994, and approved by the Secretary of the Interior on February 24, 1995. The terms of this amendment are in addition to and, except as specifically provided herein, do not supersede any of the provisions of the original compact, or Amendment II thereto.

WHEREAS, the continued growth and success of tribal gaming depends upon public confidence and trust that the tribal gaming operation is honest, fair and secure, and is free from criminal and corruptive influences;

AND WHEREAS, public confidence and trust can be maintained only if there is strict compliance with laws and regulations related to licensed gaming establishments, by all persons involved in the gaming operation;

AND WHEREAS, the relationship between the State and the Tribes rests on mutual trust and the recognition that each has a primary duty to protect the gaming public through separate, appropriate responsibilities during the life of current and future Compacts;

AND WHEREAS, the Tribes wish to amend the Compact to provide for regulation of house banked blackjack during the start up phase of its gaming facility;

AND WHEREAS, the Tribes and the State agree that the circumstances justify this Amendment;

NOW THEREFORE, the Tribes and the State hereby approve the following amendments to the Compact:

I. Section 7.B.6. is amended by adding a new subparagraph j, as follows:

j. Notwithstanding subparagraphs a, b, or c of this paragraph, if a Class III Gaming Contract application is required to be denied under subparagraphs a, b, or c of this paragraph, because a person previously associated with the applicant or an employee of the applicant has been convicted of a crime, the Tribes may enter into a contract with the applicant if the applicant has severed its relationship with that person or employee. Before the Tribes may enter into a contract under this subparagraph, the State and the Tribes must agree that the relationship between the applicant and the person or employee has been severed. For purposes of this subparagraph, a relationship is severed if

the person or the employee has no continuing connection with the direction or control of any aspect of the business of the applicant, and the person or employee is no longer employed by the applicant in any capacity. The burden of showing to the satisfaction of the Tribes and the State that a relationship has been severed is on the applicant.

II. Section 7.A.8.a. (Temporary Licensing of Employees.) is amended to read:

a. The Tribes may issue a temporary license to High Security Employees [~~30~~] seven days after submission of the application to the Oregon State Police. The Temporary license shall expire and become void upon completion of the background check and award or denial of a permanent license.

III. Appendix A. I. is amended to read:

Section 177-100-070

(1) A manufacturer shall not distribute a video lottery game or terminal for placement at the Gaming Facility unless the manufacturer and the game have been approved and the terminal has been certified by the State of Oregon. Only approved manufacturers may apply for certification of a video lottery terminal. [~~Any manufacturer approved for Oregon State Lottery shall automatically be approved for the Tribe's gaming enterprise.~~]

IV. Subsection E of Section 4 is amended to read:

E. Temporary Gaming Facility.

1. The Tribes is authorized to develop a temporary Gaming Facility on the site designated for the permanent Gaming Facility under the Compact.

2. Type of Facility. The temporary Gaming Facility will consist of a[*Chief Steel Building*] rolled steel building and one or more modular buildings and will include, in addition to the gaming floor, a surveillance room, cage, money count room, utility room,[*delicatessen*] kitchen, buffet and two bathrooms. [*A diagram of the building is attached as Exhibit II to this Compact.*]

3. Layout of Facility. The total square footage of the temporary Gaming Facility shall be no more than [*6,000*] 19,000 square feet, of which the square footage of the modular buildings shall be approximately 3,000 square feet. The proposed floor plan for the building is attached as Exhibit II to this Compact.

4. Class III Gaming. The only Class III games that will be conducted in the temporary Gaming Facility will be video lottery terminals as defined in this Compact, and blackjack as defined in this Amendment. The Tribes may install up to [*150*] 300 video lottery terminals and up to six blackjack tables in the temporary Gaming Facility. Blackjack may be offered only until December 31, 1997, unless this Compact is further amended to extend that date.

5. Duration of Temporary Gaming. Gaming under this subsection may be conducted for a period of no more than [*one year*] two years beginning after the [*effective date of this Compact*] date the temporary Gaming Facility is opened to the public and ending before the opening of the permanent Gaming Facility.

6. Access to Temporary Facility. Access to the temporary Gaming Facility shall be provided subject to the conditions imposed in Section 11.B of this Compact. The Tribes shall consult with the Oregon Department of Transportation and appropriate local officials so that access from State Highway 97 will meet appropriate standards. The Tribes is responsible to provide adequate parking off Highway 97 for patrons of the temporary Gaming Facility.

7. Alcohol Policy. [*No alcohol will be served in the temporary Gaming Facility.*] If the Tribes decide to serve alcohol in the temporary Gaming Facility, the Tribes shall enter into a memorandum of understanding with the Oregon Liquor Control Commission as provided in Section 8.F. of the Compact.

8. Security. The Tribes shall consult with the Oregon State Police to assure that all security and surveillance requirements of the Compact are fully satisfied before opening the temporary Gaming Facility.

9. Applicability of Compact Requirements: Except as explicitly provided in this subsection, all terms of this Compact, and of this Amendment, shall apply to the operation of the temporary Gaming Facility.

V. Section 4 is amended to add a new Subsection H and Appendix D, as follows:

H. Temporary Authority for Additional Game.

1. In addition to the games identified in Subsection B of Section 4 of the Compact, and subject to the conditions prescribed in this subsection, the Tribes may engage in house banked blackjack as described in Appendix D, at the gaming facility during the period specified in this section.

2. Before the Tribes begin to offer house banked blackjack at the gaming facility, the Tribal Gaming Commission shall:

   a. Develop rules and procedures for a system of internal controls that meets the minimum standards established in Appendix D.

   b. Provide appropriate training for all dealers, supervisors and surveillance personnel involved in house banked blackjack, and for the Tribal Gaming Inspector, according to the minimum training standards established in Appendix D.

   c. Establish a security and surveillance plan that meets the minimum standards established in Appendix D.

   d. Adopt rules of operation for house banked blackjack that meet the minimum standards established in Appendix D, including rules of play, standards for equipment.

   e. Adopt a dispute resolution procedure that provides for investigation and review of any player complaint.

3. The Tribes shall establish an initial wager limit of $50 per hand, except that the Tribes may offer a maximum $100 wager limit on one table. After any period of six months of operation of house banked blackjack in full compliance with the requirements of this subsection, and upon agreement between the Tribes and the State, the Tribes may change the initial wager limit. The State may refuse to agree to an increase in the initial wager limit if there have been any significant problems with the conduct of house banked blackjack due to noncompliance with the internal controls, the rules of operation of the game or with the terms of this subsection.

4. The Tribes may operate a maximum of <u>six</u> tables of house banked blackjack at the <u>temporary</u> Gaming Facility during the term of this agreement. The Tribes also agrees that during the term of this amendment, and so long as the Tribes is operating <u>six</u> blackjack tables, the Tribes will not increase the number of video lottery terminals beyond <u>300</u>. The Tribes may increase the number of video lottery terminals by decreasing the number of blackjack tables on the gaming floor and vice versa, up to the maximum number of tables specified in this paragraph. An increase of eight video lottery terminals is permitted for each decrease of one blackjack table.

5. The Tribes agrees to cooperate with State law enforcement on the investigation and prosecution of any gambling crime committed at the temporary gaming facility. The Tribes and the State agree to cooperate in establishing a state-wide system to identify and monitor persons excluded from the temporary gaming facility or from any other tribal gaming facility in this State.

6. Except as specifically provided in this amendment, this amendment does not operate to modify Subsection B of Section 4 of the Compact in any other way.

7. The Tribes and the State agree that the State shall conduct a comprehensive compliance review of the tribal gaming operation, as described in Section 9.C.1. of the Compact, to be completed no later than <u>six months after the temporary gaming facility opens</u>.

VI. Paragraph 1 of Subsection B of Section 9 of the Compact is amended to read:

1. <u>Monitoring.</u> The State is authorized hereby to monitor the Tribal gaming operation <u>as the State considers necessary</u> to ensure that the operation is conducted in compliance with the provisions of this Compact. The Tribes may request removal of a State law enforcement officer or monitor on the basis of malfeasance, abuse of authority, or conduct disrespectful of tribal institutions or culture. Effective performance of the officer's or monitor's duties shall not be a basis for disapproval. The State shall have free and unrestricted access to all areas of the Gaming Facility during normal operating hours without giving prior notice to the Tribal Gaming Operation. <u>The Tribes agrees that the State monitoring function includes at a minimum the activities identified in the Compact, the amendments and the memorandum of understanding entered into pursuant to this Compact, and that the actual, reasonable and necessary cost of monitoring activities shall be assessed to the Tribes as provided in the memorandum of understanding entered into pursuant to this Compact. In addition to the State's regular monitoring functions, the Tribes agrees that the State may conduct the following activities, which shall also be assessed to the Tribes:</u>

   <u>a.</u> <u>A comprehensive annual review, which shall be planned and conducted jointly with the tribal gaming commission, of the gaming operation to verify compliance with the requirements of this Compact and with the regulations and internal controls adopted by the tribal gaming commission, including at a minimum review in the following areas, if they involve Class III gaming activities in any way: administrative controls (gaming</u>

management internal controls), gaming operations controls, drop boxes, station inventories, surveillance department controls, cashier cage controls, count room controls (security and surveillance), accounting department controls (security), general controls (Compact regulatory requirements), blackjack controls, VLT controls, accounts payable, employee identification, gaming chip inventory for gaming floor and cage, physical examination of all class III gaming cards, chips, e-proms, paper stock, printers, keno balls, fill slips, video gaming devices, keno controls, off-track betting and security department controls;

b. Periodic review of any part of the gaming operation that involves Class III gaming in any way in order to verify compliance with the requirements of this Compact and with the regulations and internal controls:

c. Investigation of possible violations of this Compact or other gaming regulatory matter that involves Class III gaming in any way, whether discovered during the action, review, or inspection by the State during its monitoring activities, or otherwise; and

d. Investigation of possible criminal law violations that involve the conduct of the gaming operation whether discovered during the action, review, or inspection by the State during its monitoring activities, or otherwise.

VII. Section 6.A. of the Compact is amended as follows:

A. The Tribes and the State agree that maintaining the honesty, integrity, fairness and security of the Tribes' gaming operation is essential both to the success of the enterprise, and to satisfy the interests of the State and of the Tribes. The Tribes and the State agree that both of them have the responsibility to protect the citizens of this State who patronize the Tribe's gaming facility from any breach of security of the gaming operation. Accordingly, all decisions by the Tribes, the Tribal Gaming Commission and the management of the gaming operation, concerning regulation and operation of [~~their~~] the Gaming Facility, including those decisions expressly placed within the Tribes' discretion under the terms of this Compact, shall be consistent with each of the following principles:

1. Any and all [~~of the Tribes'~~] decisions concerning regulation and operation of the Tribal gaming enterprise, whether made by the Tribe, the Tribal Gaming Commission or the management of the gaming

operation, shall reflect the particularly sensitive nature of a gaming operation.

2. In order to maintain the honesty, integrity, fairness and security of the Tribes' gaming operation, the Tribes, the Tribal Gaming Commission and the management of the gaming operation shall work diligently and take all reasonably necessary affirmative steps to prevent cheating and theft, and to protect the gaming operations from the influence or control by any form of criminal activity or organization.

3. The honesty, integrity, fairness and security of the Tribes' gaming operation shall be of paramount consideration in awarding contracts, licensing and hiring employees, and in making other business decisions concerning the operation of the gaming enterprise. The Tribes, the Tribal Gaming Commission and the management of the gaming operation shall make no decisions that compromise the honesty, integrity, fairness or security of the gaming operation.

4. Regulation and operation of the Tribes' gaming activities shall be, at a minimum, consistent with generally accepted industry standards and practices, in order to maintain the honesty, integrity, fairness and security of the Tribes' gaming operation.

VIII. Subparagraph 6.B.5.a. of the Compact is amended as follows:

a. If the State, in good faith, believes that there is an immediate threat to the honesty, integrity, fairness and security of the Tribal gaming operations, and believes that substantial harm will result during the time that would pass if the procedure established in paragraphs 1 to 3 of this subsection is followed, the State may give written notice to the [~~Tribes~~] Tribal Gaming Commission. The written notice shall describe the factual basis for the State's concern. The written notice shall describe the specific action the State believes is necessary to prevent substantial harm from occurring. The State and the Tribal Gaming Commission shall confer as soon thereafter as possible to discuss alternative ways to address the State's concern. If such consultation does not result in mutually acceptable action, the Tribes agrees that the Tribal Gaming Commission shall act according to the State's recommendation, unless the commission determines that acting according to the State's recommendation would adversely affect the honesty, integrity, fairness and security of the Tribal gaming operation. Nothing in this

subparagraph shall preclude the Tribes from invoking the dispute resolution procedures provided in this Compact.

IX. Subparagraph 6.B.5.d. of the Compact is amended as follows:

d. An immediate threat to the honesty, integrity, fairness and security of the Tribal gaming operations includes but is not limited to the following examples:

(1) A criminal indictment for an offense listed in subparagraph 7.A.5.a. of the Compact is filed against any contractor, or owner or key employee of a contractor, or against any key employee of the Tribal gaming operation;

(2) A criminal organization or members of a criminal organization have obtained an ownership interest in a contractor, or a member of a criminal organization has become a key employee of a contractor;

(3) A malfunction of gaming equipment hardware or software causes patrons of the Gaming Facility to lose money, and that loss is directly related to the equipment malfunction;

(4) The security of gaming equipment has been impaired by loss, theft, or tampering;

(5) The physical safety or security of patrons is seriously at risk;

(6) A continuing pattern of failure by the Tribes, the Tribal Gaming Commission or management of the gaming operation to enforce compliance with the provisions of this Compact, or the regulations and internal controls governing the gaming operation.

X. The provisions of Section V of this amendment expire on December 31, 1997. Unless an extension of the provisions of Section V of this amendment or a permanent amendment governing the operation of house banked blackjack has been negotiated and executed before the expiration of this amendment, the Tribes agrees to terminate blackjack games at the gaming facility until a new agreement has been negotiated and executed.

EXECUTED as of the date and year below.

STATE OF OREGON

John Kitzhaber, Governor

Date: 12/19/96

THE KLAMATH TRIBES

Jeff Mitchell, Tribal Chairman

Date: 12/11/96

APPROVED BY THE SECRETARY OF THE INTERIOR

By:_____ Date:_____

TRIBAL-STATE COMPACT FOR REGULATION OF CLASS III GAMING BETWEEN THE KLAMATH TRIBES AND THE STATE OF OREGON

APPENDIX D

HOUSE BANKED BLACKJACK

I. DEFINITIONS

As used in this Amendment and Appendix the following definitions shall apply:

Blackjack. "Blackjack" is a card game in which the object of the game is to accumulate cards with a total count nearer to 21 than that of the dealer.

Industry Standard. "Industry standard" refers to standards accepted or approved by the Nevada Gaming Control Board and the Nevada Gaming Commission. If the Nevada Gaming Control Board and Nevada Gaming Commission have no accepted or approved standard, "industry standard" refers to the commonly used practice in the gaming industry in the State of Nevada.

II. ADOPTION OF RULES FOR HOUSE BANKED BLACKJACK

A. The Tribal Gaming Commission shall adopt rules to govern the conduct of house banked blackjack at the temporary gaming facility. Current copies of the game rules in effect shall be provided to the State. The rules shall include:

1. Procedures of play
2. Minimum and maximum permissible wagers
3. Payout on each form of wager
4. Procedures to be followed on occurrence of irregularities in play
5. Prohibitions on side betting between and against player and against the house
6. Hours of operation

Summaries of the rules for the method of play and payouts on winning bets shall be visibly displayed in the gaming facility and betting limits applicable to any gaming station shall be displayed at such gaming station.

B. The Tribal Gaming Commission shall also adopt specifications (may be provided by the equipment manufacturer or supplier) applicable to gaming equipment for:

1. Physical characteristics of chips; and

2. Physical characteristics of the following:

   a. Cards (including procedures for receipt and storage)
   b. Blackjack tables
   c. Blackjack layouts
   d. Dealing shoes (including procedures for receipt and storage
   e. Such other equipment as may be required for use in the game.

C. The Tribal Gaming Commission shall establish and provide to the State for review the rules and procedures for use of drop boxes at each gaming station to include: security, transportation to and from gaming stations, storage, counting and recording contents.

D. The Tribal Gaming Commission shall establish and provide to the State the duties, responsibilities and operating procedures for supervisors, pit bosses, floor managers, security and surveillance personnel.

III. INTERNAL CONTROLS

The Tribal Gaming Commission shall develop rules, policies, procedures and regulations for house banked blackjack, consistent with industry standards, that include provisions for the following:

1. Dealer Qualifications and Training Procedures
2. Shuffling, Cutting and Dealing Procedures
3. Specific Game Procedures & Rules
4. House Bank Rules (stake, chair or table rental if any)
5. Bet/Wager Limit By Table or Game
6. Card Inventory, Security and Storage
7. Replacing Decks
8. Destruction of Used Decks
9. Qualifications and Training for Floor Supervisors and Pit Bosses

10. Chips
    a. Denominations
    b. Design
    c. Table Inventory
    d. Replacement Procedures (changing chip design)
    e. Payment Procedures for Replaced Chips
11. Accepting Tips by Dealers
12. Federal and State Tax Reporting
13. Distributing gaming chips to gaming stations
14. Procedures for opening and closing gaming stations
15. Procedures for removing chips and coins from gaming stations
16. Table Identification

IV. TRAINING

A. The Tribal Gaming Commission shall require each blackjack supervisor, each pit boss, each blackjack dealer and all surveillance personnel to be trained either by a training school, academy or college recognized under industry standards or through an in-house training program such that the supervisor, pit boss, dealer or surveillance employee has the knowledge and skills required under industry standards for the job function that employee performs.

B. If blackjack dealers are trained through an in-house training program, the Tribe and State must agree that the training program meets the following minimum standards:

1. A minimum of 96 hours of instruction.
2. The instruction shall consist of a combination of lecture and laboratory.
3. The instruction shall be provided by an instructor licensed by the Tribal Gaming Commission.
4. The curriculum must be designed to provide students with the knowledge and skills necessary to satisfy entry level requirements common in the industry.

C. Each blackjack supervisor, pit boss and surveillance officer, shall receive training sufficient to meet industry standards in the areas of game protection, player money management and betting, card counting, and detection of other cheating methods.

D. The Tribal Gaming Commission may license blackjack trainers. At a minimum those licensees shall demonstrate sufficient skills, and meet minimum requirements that are consistent with industry standards, in the area of house banked blackjack. The Gaming Commission shall impose appropriate requirements for trainer licensing, such as graduation from a training school, academy or college recognized by the industry as having expertise in the areas of casino management and house banked blackjack, or an

acceptable substitute of actual experience and references and a demonstrated ability to teach blackjack dealing skills and/or blackjack theory and games protection.

E. Training by the Tribe is not required under this Section IV. for employees who have previous experience in their assigned job function if the employee has been evaluated by gaming management under rules adopted by the Tribal Gaming Commission. The rules of the commission shall be consistent with industry standard, and shall provide, at a minimum, that an experienced employee be tested for knowledge of all applicable rules, procedures and internal controls, and for proficiency in the skills necessary for the assigned job function.

V. SURVEILLANCE SYSTEMS

A. SURVEILLANCE SYSTEMS (GENERAL)

1. The purposes of a gaming facility surveillance system is to safeguard assets, to deter, detect and prosecute criminal acts, and to maintain public confidence and trust that Tribal gaming is conducted honestly and free of criminal elements and activity.

2. The management of the gaming facility shall develop a surveillance system plan, and install, maintain and operate the gaming facility surveillance system in accordance with the standards set forth in this Appendix. The surveillance system plan shall be approved by the Tribal Gaming Commission if it satisfies the minimum standards.

3. The management of the gaming facility shall submit the surveillance system plan to the State for review [*within 30 days after the date of execution of this amendment.*] **no later than 90 days before the date the gaming facility is scheduled to open to the public.**

4. The plan shall include a description of all equipment utilized in the surveillance system; a blueprint or diagram that shows all of the areas to be monitored and the placement of surveillance equipment in relation to the activities being observed; a description of the procedures utilized in the operation of the gaming facility surveillance system; a description of the qualifications, training, and procedures of surveillance personnel; organizational reporting structure for surveillance personnel; and any other information required by the standards set forth in this Appendix.

5. The State shall review the proposed surveillance system plan submitted by the Tribe and advise the Tribal Gaming Commission and the management of the gaming facility whether the minimum standards are satisfied. The State shall review the installation of the surveillance system when a review and inspection is performed. The State shall advise the Tribal Gaming Commission and the management of the gaming facility whether the surveillance system has been installed, maintained, and operated according to the minimum standards. The Tribe agrees that the surveillance system will be altered as

necessary to meet the minimum standards. If the Tribe currently has a surveillance system in place, the surveillance plan may use a combination of current equipment and new to meet the standards, if there is no compromise of picture and recording quality.

6. In addition to the State's right of access provided in section 9.C.1. The State may review the operation of the surveillance system at least twice each year during an announced compliance audit. The State shall have access at any time to all surveillance records, tapes, reports and monitoring rooms at any time for the purpose of monitoring compliance with minimum standards and to confirm gaming integrity or security.

7. At the completion of any random or scheduled inspection the State will report its findings concerning the surveillance system to the Tribal Gaming Commission and the gaming facility management. The Tribe and State agree that the results of the inspection are for the internal use of the Tribe and the State and, to the extent allowed under Oregon law, shall not be disclosed by the State to anyone other than the Tribal Gaming Commission and gaming facility management unless such disclosure is necessary for resolution of a dispute pursuant to the procedures in Section 16 of the Compact, or to provide evidence for a criminal prosecution.

8. The gaming facility management shall separate management of the functions of security and surveillance within the temporary gaming facility.

9. The State shall perform a background investigation on all personnel employed as surveillance personnel, as provided in section 7 of the compact.

B. SURVEILLANCE SYSTEMS MINIMUM STANDARDS

1. SURVEILLANCE SYSTEM EQUIPMENT

   a. The surveillance system equipment must be able to identify each player, the dealer, and be of sufficient resolution and clarity to read individual cards and money denomination.

   b. The surveillance system shall be a combination of fixed cameras and pan-tilt-zoom (PTZ).

   c. The cameras and monitors may be either black and white, color or a combination of both. (The State recommends, but does not require, a combination of black/white and color.)

   d. The primary surveillance room and monitors must have override capabilities.

   e. Gaming Facility management shall establish communications systems on the gaming floor that are capable of immediately alerting surveillance personnel.

   f. Telephones on the gaming floor shall have the capability of a direct line or extension to the surveillance personnel.

   g. Surveillance personnel in the surveillance room shall have radio communication with security personnel if security officers have radio communication with each other.

   h. Surveillance equipment shall include a means by which surveillance personnel may observe and videotape all money transfers between the cashier and the gaming floor as transfers occur. The surveillance plan shall provide a means by which surveillance personnel can verify the locations, table number, time, date, and amount of transfers, and to whom the transfers were made.

   i. All monitors being recorded must display time and date on screen

   j. All fixed cameras will be continuously taped. All PTZ cameras will have the capability for taping of what is being monitored.

2. SURVEILLANCE SYSTEM EQUIPMENT LOCATIONS. At a minimum, surveillance cameras must provide:

   a. Main cashier

      (1) Overview of cage working area

(2) Ability to identify patrons and employees
(3) PTZ or fixed camera allowing identification of cash transactions at each cash drawer
(4) Camera over file window

b. Soft count room

(1) Clear view of entire count room
(2) Camera directly over count table to identify dollar amounts
(3) Clear view of vault
(4) Clear view of drop box
(5) Ability to read counting scale/meter

c. Hard count room (if used)

(1) Clear view of entire count room
(2) Clear view of wrapping and/or counting machine

d. Pit

(1) Ability to determine chip value and card value
(2) Clear view of playing surface
(3) Ability to identify patron, employee and table number

e. Card Game Tables

(1) Fixed camera at each table
(2) Same view and identification requirements as pit cameras

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