

1 CALIFORNIA CODE OF REGULATIONS
2 TITLE 4. BUSINESS REGULATIONS.

3
4 DIVISION 18. CALIFORNIA GAMBLING CONTROL COMMISSION.
5 (AMENDED REGULATIONS EFFECTIVE APRIL 4, 2025)
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7 *The California Gambling Control Commission hereby adopts the following changes to its*
8 *regulations located in Division 18 of Title 4 of the California Code of Regulations:*
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10 **CHAPTER 7. CONDITIONS OF OPERATION FOR GAMBLING ESTABLISHMENTS.**

11 **ARTICLE 3. MINIMUM INTERNAL CONTROL STANDARDS (MICS) FOR CARDROOM BUSINESS**
12 **LICENSEES.**
13

14 **12396. Surveillance.**

15 (a) The policies and procedures for all Tiers must meet or exceed the following standards for
16 surveillance:

17 (1) Cardroom business licensees must install and maintain, on site in their gambling establishment, a
18 surveillance system, with video recording and closed circuit television (CCTV) monitoring capabilities, to
19 record critical activities related to the cardroom business licensees' gambling operations. The surveillance
20 system must record with reasonable coverage and clarity, at a minimum, the gambling operation,
21 including card values, wagers, and game outcomes, the payment of player drop fees, the collection of
22 drop boxes, the drop count processes, cage and cashier activities, gambling equipment storage areas
23 except for furniture storage areas, and the interior of gambling establishment entrances and exits. For the
24 purposes of this paragraph, an overhead view of card values, wagers, and game outcomes is acceptable
25 for Tier I licensees. This paragraph does not apply to demonstration or instructional tables, when cash or
26 prizes are not being wagered, won or lost. The video recording equipment must include date and time
27 generators which must display the current date and time of recorded events on videotape or digital
28 recordings. The displayed date and time must not significantly obstruct the view of recorded images. The
29 surveillance system may have remote, off-site access capabilities, but only ancillary to any on-site
30 systems required by this section.

31 (2) All surveillance recordings must be made in real time mode, or at a speed sufficient to capture and
32 record with reasonable completeness the actions of all individuals being observed.

33 (3) All video surveillance cameras must be installed in a manner that prevents them from being
34 intentionally obstructed, tampered with or disabled by patrons or employees, to the extent reasonably

1 possible. All recording and monitoring equipment must be located in secure rooms or areas of the
2 gambling establishment so that access is controlled.

3 (4) The surveillance system operation must be checked daily to ensure that all surveillance equipment
4 is functioning properly and reasonable efforts must be made to repair or replace malfunctioning
5 surveillance equipment within 72 hours of the discovery of the malfunctions. With the exemption of
6 parking lots, if at any time, the surveillance system ceases to be able to record any area of the gambling
7 establishment required to be recorded in accordance with this Article, the cardroom business licensee
8 must take lawful steps to ensure the area is not used for any activity subject to surveillance requirements
9 until the surveillance system is able to record the area. For the purposes of this paragraph, lawful means in
10 accordance with federal, state, and local requirements.

11 (5) A digital video recorder (DVR), network video recorder (NVR), or equivalent system will be
12 utilized meeting the following standards:

13 (A) The system must have a failure notification system that, at a minimum, provides a visual
14 notification of any failure in the surveillance system or the media storage system.

15 (B) The system must have a media storage system that is configured so that a failure of any single
16 component will not result in the loss of any data from the media storage system.

17 (C) The system must have the capability to reproduce or copy all or any portion of the stored data
18 from the media storage system to a digital video disk (DVD) or a portable digital storage device.

19 (D) A single system must not have more than eight cameras required by the standards of this section,
20 unless the system has an appropriate backup system to ensure that there is no loss of data in the event of a
21 failure of the primary system or any single component of that system.

22 (6) Videotapes or other recording media must be marked or coded to denote the activity recorded.

23 (7) Unless otherwise requested by the Bureau, all recordings must be retained for a minimum of 14
24 complete days of operation, except that recordings that are determined by the Bureau or a law
25 enforcement agency to be of evidentiary value must be retained for a period specified in writing by the
26 determining agency. Recordings of any criminal offense subject to reporting pursuant to paragraph (4) of
27 subsection (a) of Section 12395 must be retained indefinitely, or until the Bureau authorizes their
28 disposal.

29 (8)(A) For the purpose of enforcing the provisions of the Act, this division, or Division 3 of Title 11
30 of the California Code of Regulations, Bureau staff, with the approval of the Chief, may, at any time
31 during the gambling establishment's actual hours of operation, demand immediate access to the
32 surveillance room and any area of the gambling establishment where surveillance equipment is installed
33 or maintained or where surveillance video recordings are stored, and such access must be provided by the
34 cardroom business licensee or the cardroom business licensee's authorized representative.

1 (B) The Bureau may, pursuant to subparagraph (D) of paragraph (1) of subdivision (a) of section
2 19827 of the Business and Professions Code, take custody of and remove from the gambling
3 establishment the original of any video recording, or a copy of any digital recording, required to be made
4 and maintained pursuant to the Act or this division. Any surveillance video recording that is in the
5 custody of the Bureau pursuant to this paragraph may be disclosed by the Bureau only when necessary to
6 administer or enforce the provisions of the Act, this division, or Division 3 of Title 11 of the California
7 Code of Regulations or when necessary to comply with a court order. Upon reasonable request of the
8 cardroom business licensee or the cardroom business licensee's authorized representative, a copy of the
9 recordings must be made and left on the premises if copying equipment is available to enable Bureau staff
10 to make copies. If copying equipment is not available to Bureau staff, upon reasonable request of the
11 cardroom business licensee or the cardroom business licensee's authorized representative, a copy of the
12 recordings will be provided to the cardroom business licensee at the cardroom business licensee's
13 expense, unless the Bureau expressly waives its costs of providing the copies.

14 1. Digital copies will be a clear representation of the original.

15 2. The cardroom business licensee will provide the Bureau with any software necessary to view the
16 digital copies or provide the digital copies in a format that is acceptable to the Bureau.

17 (9) Cardroom business licensees must prominently display in a place and manner conspicuous to all
18 patrons entering and exiting the gambling establishment, a sign containing the following statement
19 printed in bold lettering of sufficient size to be visible and readable: "All Public Areas, Entrances and
20 Exits of This Establishment are Subject to Surveillance and Video Recording." The lettering and
21 background must be of contrasting colors, and the sign must comply in all respects with applicable
22 signage requirements, if any, of the local jurisdiction.

23 (b) In addition to the requirements of subsection (a), the policies and procedures for Tiers II through
24 and including V must meet or exceed the following standards for surveillance:

25 (1) The surveillance system must have dedicated cameras to monitor and record entrances and exits
26 with sufficient clarity to afford reasonable opportunity to identify any person entering and exiting.

27 (2) The surveillance system must have a sufficient number of cameras dedicated to gambling tables to
28 be capable of viewing and recording, with reasonable coverage and clarity, patrons, dealers, wagers, card
29 values, and game outcome at each table. For the purposes of this paragraph, an overhead view of patrons
30 and dealers is acceptable. This paragraph does not apply to demonstration or instructional tables, when
31 cash or prizes are not being wagered, won or lost.

32 (3) The surveillance system must include an audio recording of, at a minimum, any areas of the
33 gambling establishment that are used for vault or count room functions.

1 (c) In addition to the requirements of subsections (a) and (b), the policies and procedures for Tiers III
2 through and including V must include standards for surveillance that require the surveillance system to
3 include coverage and recording with sufficient clarity to provide opportunity to obtain a description of
4 vehicles, including, to the extent feasible, the license plates of vehicles, entering and exiting all adjoining
5 parking areas owned, operated or otherwise controlled by the cardroom business licensee for use by its
6 patrons.

7 (d) In addition to the requirements of subsections (a), (b), and (c), the policies and procedures for
8 Tiers IV and V must meet or exceed the following standards for surveillance:

9 (1) Cardroom business licensees must establish a surveillance unit separate and apart from the
10 security department. The head of the surveillance unit and all surveillance unit personnel must be
11 independent of the security department and have no other gambling-related duties.

12 (2) Cardroom business licensees must establish and maintain a separate surveillance room that meets
13 or exceeds the following requirements:

14 (A) The surveillance room must have controlled access through a secured door or doors, which must
15 be under constant recorded video surveillance.

16 (B) No entrance or exit door of a surveillance room will be readily observable or accessible from the
17 gambling operation area.

18 (3) Routine access and entry into the surveillance room must be limited to on-duty employees of the
19 surveillance unit assigned to monitor gambling operations. Cardroom employee type licensees may be
20 granted access to the surveillance room for the purpose of performing their duties. Other persons may be
21 granted limited access to the surveillance room for educational, investigative or maintenance purposes, if
22 accompanied at all times by a surveillance unit employee.

23 (4) At least one surveillance employee must be present in the surveillance room and actively
24 monitoring the gambling operations, via the surveillance room equipment, during all hours of operation,
25 except that the surveillance room may be unattended for no more than a total of one hour during any shift
26 or eight-hour period to allow for required meal and rest breaks for staff. No controlled gambling may take
27 place when a surveillance employee is not present and on duty in the gambling establishment, whether on
28 a break or not. Notwithstanding the foregoing, a Tier IV cardroom business licensee may utilize a
29 contingency plan previously approved by the Bureau to use a cardroom employee type licensee to fulfill
30 the requirements of this paragraph when due to unforeseen exigencies a surveillance employee is
31 unavailable.

32 (A) A request for the Bureau's review and approval of a contingency plan must be submitted by the
33 Tier IV cardroom business licensee to the Bureau in writing, along with the contingency plan.

1 (B) The contingency plan will be deemed approved if not disapproved by the Bureau in writing
2 within 30 calendar days of receipt of the written request for failing to include a contingency plan that
3 states a cardroom employee type licensee will fulfill the requirements of paragraph (4) of this subsection
4 when due to unforeseen exigencies a surveillance employee is unavailable.

5 (C) The cardroom business licensee must notify the Bureau in writing within five calendar days after
6 utilizing the contingency option.

7 (5) Count room surveillance must include closed circuit television (CCTV) monitoring and video
8 recording.

9 (6) Cardroom business licensees must maintain a record of all surveillance activity in the surveillance
10 room, by surveillance period or shift, in a surveillance activity log. The surveillance activity log entries
11 must be made by on-duty surveillance personnel and must include, at a minimum, the following:

12 (A) The date and time of commencement of the surveillance period or shift;

13 (B) The printed name(s) of the person(s) conducting the surveillance;

14 (C) The date and time of termination of the surveillance period or shift;

15 (D) A summary of the results of the surveillance, including a notation of the time of recording of any
16 event, activity, occurrence, process or procedure that was monitored during the surveillance period or
17 shift, whether the recording or monitoring was required or not;

18 (E) A notation of the time of the discovery or occurrence of any equipment or camera malfunctions
19 during the surveillance period or shift;

20 (F) A notation of the time of the correction or repair of any equipment or camera malfunctions
21 occurring during the surveillance period or shift, if corrected or repaired during that period or shift;

22 (G) A notation of the time of the correction or repair of any equipment or camera malfunctions
23 discovered and noted in a previous surveillance period or shift, if corrected or repaired during the current
24 period or shift;

25 (H) A notation of the time of occurrence of any medical emergency event or law enforcement event,
26 including any incident number generated by the responding entity, if available;

27 (I) A notation of the time(s) of drop box collection occurring during the surveillance period or shift;

28 (J) A notation of the time of drop count procedure(s) occurring during the surveillance period or shift;
29 and,

30 (K) A notation of the times of patron disputes occurring during the surveillance period or shift that
31 required the intervention of the security department, if any.

32 (7) Each gambling table must have a dedicated camera, meeting the requirements of paragraph (2) of
33 subsection (a), providing clear surveillance coverage of all controlled gambling at all hours of operation.
34 In addition, one Pan/Tilt/Zoom (PTZ) camera must be installed for every ten or fewer authorized tables

1 present in any gambling operations area of the gambling establishment. A reasonable attempt must be
2 made to pan the faces of patrons and dealers for identification at least once per work shift of surveillance
3 unit employees.

4 Note: Authority cited: Sections 19840, 19841 and 19924, Business and Professions Code. Reference: Sections
5 19827, 19841, 19922 and 19924, Business and Professions Code.