

TITLE 11—DEPARTMENT OF PUBLIC SAFETY
Division 45—Missouri Gaming Commission
Chapter 20—Sports Wagering

PROPOSED RULE

11 CSR 45-20.200 Surveillance Requirements for Retail Licensees

PURPOSE: This rule establishes surveillance requirements for Retail licensees.

- (1) All equipment that is used to monitor or record shall be solely accessible to the surveillance personnel, except when that equipment is being repaired or replaced.
- (2) The interior of the surveillance room shall not be visible to the public.
- (3) The commission shall at all times be afforded immediate access to the surveillance room and all records relating to that surveillance.
- (4) Each surveillance room shall have a minimum of four (4) monitors, with appropriate switching capability to ensure that all surveillance cameras are accessible.
- (5) While the sportsbook cage is open, surveillance shall observe ticket writer transactions periodically to ensure internal control procedures are followed and wagers are accepted and winnings are paid appropriately.
- (6) Each kiosk drop process, including the transportation of drop devices, and the kiosk count process shall be continuously monitored and recorded by surveillance personnel, including emergency drops and counts.
- (7) The surveillance camera views shall be recorded. All video recordings shall be maintained for at least thirty (30) days.
- (8) Surveillance room personnel shall maintain a surveillance shift log of all surveillance activities. The 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 kiosk, point of sale equipment, or money handling equipment;
 2. 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;
 3. The beginning, end, and any interruptions of all required drop and count processes, including emergency drops;
 4. Any observed procedural or internal control violations;

5. Any observed criminal activity;
 6. Any surveillance conducted on anyone or any activity that appears—
 - A. To be abnormal, suspicious, illegal, or an emergency; or
 - B. To violate the rules of the commission;
 7. Any surveillance conducted at the request of—
 - A. An employee; or
 - B. A commission agent;
 8. All persons reviewing surveillance recordings;
 9. All persons entering and exiting the surveillance room, excluding surveillance personnel and commission personnel;
 10. All surveillance personnel entering and exiting the surveillance room only at the beginning and ending of their shifts; and
 11. Any other notations deemed necessary by surveillance personnel or the commission to ensure compliance with the statutes, regulations, and internal controls;
- (D) Be provided to the commission daily; and
- (E) Be retained for at least one (1) year.
- (9) A surveillance incident report shall be completed for any activity involving unusual or criminal activity and any violation of the statutes, regulations, or internal controls and shall—
- (A) Be made by the employee responsible for monitoring the activity;
 - (B) Contain the report number and details of the incident observed;
 - (C) Be provided to the commission daily; and
 - (D) Be retained for at least one (1) year.
- (10) All recordings of surveillance incident reports shall be retained for one (1) year and shall be listed on a surveillance recording retention log by surveillance personnel with the date, times, and identification of the person monitoring the recording. Original recordings shall be released to the commission upon request.
- (11) Any recording that records illegal or suspected illegal activity or suspicious wagering activity shall, upon completion of the recording, be transferred to a read-only, non-erasable format. The recording shall be placed in a separate, secure area and the commission shall be notified.
- (12) A surveillance release log shall be maintained to record who receives a copy of video recordings. Video recordings of criminal or regulatory investigations or violations shall not be released to anyone without the written approval of the commission.
- (13) Any malfunction of surveillance equipment shall necessitate the immediate replacement or repair. If immediate replacement or repair is not possible, the commission shall be notified.
- (14) Any Retail licensee, who is not a Class B licensee, operating on an excursion gambling boat may contract with the Class B licensee to provide the surveillance requirements for the sports wagering operation through its approved surveillance system.
- (15) Any Retail licensee, who is a Class B licensee, may utilize its existing surveillance operation to provide the surveillance requirements for the sports wagering operation.

(16) The Retail licensee shall maintain a closed surveillance system. Remote access to the surveillance system is prohibited.

(17) Each Retail licensee shall submit a surveillance plan to the commission prior to commencing sports wagering operations. The plan shall include a floor plan that shows the placement of all surveillance cameras and a detailed description of the procedures utilized in the operation of the surveillance system and its equipment.

(18) The Retail licensee shall, in its surveillance department, maintain a copy of its surveillance system plan which shall be kept current, documenting any changes to the surveillance system, placement of equipment, or the description of procedures utilized in its operation. Surveillance system plans or a copy thereof shall be made immediately available to any agent of the commission upon request.

AUTHORITY: section 39(g) of Article III, Mo. Const., sections 313.004 and 313.800–313.850, RSMo 2016 and Supp. 2024. Original rule filed May 14, 2025.

PUBLIC COST: This proposed rule will not cost state agencies or political subdivisions more than five hundred dollars (\$500) in the aggregate.

PRIVATE COST: This proposed rule will cost private entities an estimated two hundred forty thousand dollars (\$240,000) in the aggregate.

*NOTICE OF PUBLIC HEARING AND NOTICE TO SUBMIT COMMENTS: Anyone may file a statement in support of or in opposition to this proposed rule via email to MGCPolicy@mgc.dps.mo.gov, or by mail to the Missouri Gaming Commission, Policy Section, PO Box 1847, Jefferson City, MO 65102. To be considered, comments must be received within thirty (30) days after publication of this notice in the **Missouri Register**. A public hearing is scheduled for July 17, 2025, at 10:00 a.m., in the Missouri Gaming Commission's Hearing Room, 3417 Knipp Drive, Jefferson City, MO.*