

CALIFORNIA GAMBLING CONTROL COMMISSION
SPECIFIC LANGUAGE OF PROPOSED REGULATIONS

CAGE, PODIUM AND WORKSTATION OPERATION AND FUNCTIONS
CGCC-GCA-2012-0#-R

CALIFORNIA CODE OF REGULATIONS

TITLE 4. BUSINESS REGULATIONS.

DIVISION 18. CALIFORNIA GAMBLING CONTROL COMMISSION.

CHAPTER 7. CONDITIONS OF OPERATION FOR GAMBLING ESTABLISHMENTS.

ARTICLE 1. GENERAL PROVISIONS.

§ 12360. Chapter Definitions.

Unless otherwise specified, ~~the~~ definitions in Business and Professions Code section 19805, and Section 12002 of this division, shall govern the construction of this chapter. As used in this chapter:

(a) “Confidential document” includes, but is not limited to, any document, record or writing that contains any financial or personal information (e.g., credit and check cashing information, exclusion lists, Title 31 reports, etc.) concerning any entity, individual or group of individuals; any internal control procedure information, other than fire safety and evacuation plans; or any other information or document; the public disclosure of which may jeopardize the safety and security of patrons, employees and their property or the assets of the gambling enterprise, or the integrity of gambling operations.

(b) “Controlled inventory” includes, but is not limited to, playing cards, tiles, dice, dice cups, card shufflers or any other equipment, devices or supplies used or intended for use in the play of any controlled game.

(c) “Licensee” means “owner licensee” as defined in Business and Professions Code section 19805, subdivision (a~~ed~~).

(d) “Monetary inventory” includes, but is not limited to, gambling chips, cash and cash

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1 equivalents.

2 (e) “Podium” means any furnishing, fixture, appurtenance or device, other than a cage,
3 workstation, gaming table or food service station, located on or near the gaming floor, or in any
4 location within the gambling establishment~~that is accessible to any~~ where patrons or the public
5 are permitted, which is primarily used for the storage and distribution of gambling chips, cash,
6 and cash equivalents (a monetary inventory)~~; playing cards, dice, dice cups, card shufflers, or~~
7 ~~any other gambling equipment or supplies,~~ and which may be referred to as a podium, chip box,
8 stand, cupboard, cabinet or any term of like meaning (hereinafter podium).

9 (f) “Security department;” means the operational entity within a gambling establishment
10 that is responsible, but not necessarily solely responsible, for patrol of the public areas of the
11 establishment, and to assist in:

- 12 (1) Maintaining order and security;
- 13 (2) Excluding underage patrons;
- 14 (3) Responding to incidents involving patrons or others;
- 15 (4) Detecting, reporting and deterring suspected illegal activity; and
- 16 (5) Completing incident reports.

17 (g) “Surveillance unit;” means the operational system or entity within a gambling
18 establishment that is responsible for the video recording, as may be specified in Article 3 of this
19 chapter, of all activities required to be under surveillance, monitored and/or recorded pursuant to
20 the Act and this division for the purposes of detecting, documenting and reporting suspected
21 illegal activities, including suspected gambling by persons under 21 years of age, and assisting
22 the personnel of the security department in the performance of their duties.

23 (h) “Workstation” means any furnishing, fixture, appurtenance or device, other than a cage,
24 podium, gaming table or food service station, located on the gaming floor, or in any location
25 within the gambling~~establishment that is accessible to any~~ where patrons or the public are
26 permitted, the principal function of which is to provide gambling enterprise employees a
27 convenient location at which they may perform some or all of their duties.

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1 NOTE: Authority cited: Section 19811, 19824, 19840, 19841 and 19924, Business and Professions Code.
2 Reference: Section 19805, 19841, 19860 and 19924, Business and Professions Code.

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4 ARTICLE 3. MINIMUM INTERNAL CONTROL STANDARDS (MICS)
5 FOR GAMBLING ESTABLISHMENTS.

6 **§ 12386. ~~Cage and Satellite Cage~~ Operation and Functions.**

7 (a) The policies and procedures for all Tiers shall meet or exceed the following standards for
8 ~~the cages and satellite cages~~:

9 (1) The licensee shall maintain within the gambling establishment at least one separate and
10 secure area at a fixed location that is accessible to the public, and that is designated as ~~the~~ a cage.
11 ~~The~~ A cage shall be located, designed, constructed and operated to provide appropriate security
12 and accountability for ~~funds~~ all monetary transactions occurring at the cage and all cage content
13 which may include, but is not necessarily limited to, a monetary inventory, a controlled
14 inventory and confidential documents.

15 (2) The licensee shall designate at least one gambling enterprise employee to process
16 monetary transactions through ~~the~~ a cage. All employees designated to process monetary
17 transactions through ~~the~~ a cage shall be listed by title, classification or position on the gambling
18 establishment’s organizational chart, ~~and shall be responsible for~~ The designated employees’
19 duties shall include any or all of the following:

20 (A) Custody of the cage or individual cage drawer inventory, which is comprised of currency,
21 coin, patron checks, gambling chips, forms, documents and records consistent with the operation
22 of a cage or individual cage drawer.

23 (B) Receipt, and distribution, ~~and redemption~~ of gambling chips.

24 (C) Deposits to and withdrawals from players’ banks and dealers’ banks.

25 (D) ~~Cashing checks~~ Check cashing and ~~or~~ extensions of credit for patrons, as permitted by
26 the licensee’s policies and procedures.

27 (E) Preparation of cage accountability reconciliations and records necessary to document
28 compliance with the requirements of this chapter.

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1 (F) Recording patron information that is necessary for compliance with the requirements of
2 sections 5313 and 5314 of Title 31 of the United States Code, sections 103.21, 103.22, 103.23,
3 103.63 and 103.64 of Title 31 of the Code of Federal Regulations, and subsection (a) of Section
4 12404 of this chapter.

5 (G) Ensuring the proper accounting and safeguarding of ~~funds and chips~~ any monetary
6 inventory, controlled inventory or confidential documents stored or otherwise held in a cage.

7 (3) Routine access and entry into ~~the a~~ cage area shall be limited to on-duty cage personnel
8 designated pursuant to paragraph (2) of this subsection. Other employees of the gambling
9 ~~establishment~~ enterprise who hold a valid gambling license or work permit may be granted
10 access to ~~the a~~ cage area for the purpose of performing their duties.

11 (4) A log shall be maintained, either in writing or electronically, to document entry into ~~the a~~
12 cage by any person not authorized access pursuant to paragraphs (2) and (3) of this subsection.
13 The log must contain the person's name, title, date of entry, and time entering and exiting; or
14 provide substantially equivalent information through an automated access control system. Any
15 automated access control system must provide a secure, tamperproof means of recording and
16 maintaining entry and exit information.

17 (5) Cage activity shall be reconciled after each shift by the incoming and outgoing designated
18 cage employees. If an imprest drawer is used, each outgoing designated cage employee
19 responsible for an imprest drawer shall reconcile his or her drawer to the imprest amount. All
20 transactions that flow through ~~the a~~ cage shall be appropriately summarized and documented, in
21 writing, for each shift. The cage activity reconciliations shall be posted and reconciled to the
22 general ledger at least monthly. For the purposes of this ~~paragraph~~ section, the word "shift"
23 means an individual employee's shift, or two or more employees that work the same schedule.

24 (6) The purchase or redemption of gambling chips by a patron may only occur at ~~the a~~ cage
25 or from a designated gambling ~~establishment~~ enterprise employee on the gambling floor.
26 Licensees shall not permit proposition player services providers to purchase or redeem gambling
27 chips for cash or cash equivalents from a patron or to sell gambling chips to a patron. For the

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1 purposes of this article, the purchase or redemption of gambling chips or the sale of gambling
2 chips shall not include the exchange of a chip or chips of one total value for a chip or chips of an
3 equal total value.

4 (7) If a licensee operates more than one cage at any time during any shift, all cages,
5 irrespective of their designations (e.g., main cage, satellite cage, auxiliary cage, supplementary
6 cage, secondary cage, back up cage, support cage, etc.), shall be subject to and comply with all
7 provisions of this article applicable to the operation and functions of cages for the licensee’s tier.

8 (b) In addition to the requirements of subsection (a), the policies and procedures for Tiers III
9 through and including V shall include the following standards for ~~the~~ a cage:

10 (1) ~~The cage and cage activities shall be under continuous recorded video surveillance.~~

11 ~~(2)~~ The reconciliation of ~~the~~ cage transactions provided for in paragraph (5) of subsection (a);
12 shall be summarized on a cage accountability form that shall include, at a minimum, all of the
13 following, as applicable:

14 (A) The date of the reconciliation;

15 (B) The designation of the shift being reconciled;

16 (C) An accounting of all items in the cage inventory (e.g., ~~cash, coin, chips~~ monetary
17 inventory, players’ and dealers’ banks, etc.), for each cage window, drawer or bankroll in use
18 during the subject shift, including:

19 1. The beginning shift balances, unless an imprest drawer is used;

20 2. All credits (receipts);

21 3. All debits (disbursements);

22 4. The ending balances;

23 5. An identification of any overage or shortage with an explanation, if known.

24 (D) The printed name and signature of each designated cage employee (incoming and
25 outgoing, unless an imprest drawer is used) performing the reconciliation.

26 ~~(3)~~ The cage activity reconciliations specified in paragraph ~~(2)~~ (1) of this subsection shall be
27 posted and reconciled to the general ledger, as provided in paragraph (5) of subsection (a), by

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1 someone other than a designated cage employee or cage supervisor.

2 (c) In addition to the requirements of subsections (a) and (b), the policies and procedures for
3 Tiers IV and V shall include the following standards for ~~the a~~ cage:

4 (1) The design and construction of ~~the a~~ cage shall include:

5 (A) A manually triggered silent alarm system connected directly to the surveillance unit, or
6 its equivalent, or an alarm monitoring agency; and

7 (B) Access through a secured door or doors, which shall be under constant recorded video
8 surveillance in accordance with the applicable provisions of Section 12396.

9 (2) In addition to the information specified in paragraph (21) of subsection (b), the cage
10 accountability form referenced therein shall include an itemization of the following, with
11 beginning and ending balances for non-imprest drawers, and ending balances for imprest
12 drawers:

13 (A) Cash and coin by denomination;

14 (B) Gambling ~~E~~chips by denomination;

15 (C) All other items of monetary value (e.g., markers, patron checks, players' and dealers'
16 banks, chip runners' banks, etc.), specifying the source of each~~;~~.

17 (3) The licensee shall maintain a list, either in writing or electronically, of the names of all
18 persons designated pursuant to paragraph (2) of subsection (a) as being authorized to access
19 ~~and/or enter the a~~ cage, which list shall specify those persons who possess the combination or the
20 keys or who control the mechanism to open the devices securing the entrance to ~~the a~~ cage, and
21 those who possess the ability to operate the alarm system. The list shall be updated each time a
22 designation is added or deleted.

23 (d) In addition to the requirements of subsections (a), (b) and (c), the policies and procedures
24 for Tier V shall include standards for ~~the a~~ cage that require monitored and recorded video
25 surveillance of the interior of the cage and all of its contents, and the exterior of all access doors
26 in accordance with the applicable provisions of Section 12396.

27 (e) Licensees shall establish and implement the applicable standards for cage functions

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1 specified in subsections (a) through and including (d) no later than April 1, 2010.

2 NOTE: Authority cited: Sections 19840, 19841 and 19924, Business and Professions Code. Reference: Sections
3 19841, 19922 and 19924, Business and Professions Code.

4

5 **§ 12387. Podium and Workstation Operation and Functions.**

6 (a) The policies and procedures for all Tiers shall meet or exceed the following standards for
7 podiums:

8 (1) A podium shall be located in an area where it is clearly visible for security and
9 surveillance purposes, and shall not be obstructed or shielded from view by any wall, partition,
10 structure, curtain, sign, furnishing, fixture, appurtenance, decoration or any other object.
11 Reasonable provision shall be made to prevent or deter a podium from being easily moved while
12 in operation, which provision may include, but is not necessarily limited to, securely affixing the
13 podium to a wall or to the floor, or if a mobile podium is used (such as a “chip cart”), by locking
14 its wheels.

15 (2) A podium shall be kept under continuous recorded video surveillance~~utilizing a~~
16 ~~dedicated video camera,~~ in accordance with the applicable provisions of Section 12396. The
17 camera coverage shall be adequate to enable monitoring and recording of the contents of any
18 drawer when open, and all transactions and activities occurring at the podium.

19 (3) A podium shall be constructed in a manner that provides for the security of its contents,
20 and every opening shall be covered in a manner that conceals its contents from view. Each
21 drawer and compartment~~cover of a podium~~ that is used or intended to be used to hold a
22 monetary inventory, controlled inventory or confidential documents, shall have a locking
23 mechanism securing its contents which shall remain locked at all times, with the key removed,
24 whether the drawer or compartment is empty or in use, except when being accessed by
25 designated gambling enterprise employees in the performance of their duties.

26 (4) All locks or locking devices~~on a~~ for podium drawers or compartments containing or
27 intended to contain a monetary inventory shall be keyed differently from the locks of any other
28 podium, container, table or equipment in the gambling establishment, and each of those drawers

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1 or compartments of a podium that contains or is intended to contain a monetary inventory shall
2 be keyed differently from any other drawer or compartment of that podium. Designated
3 managers and supervisors whose duties include the supervision or oversight of chip runners and
4 may require access to multiple monetary inventories, may have a master key that will open some
5 or all of the locking devices for monetary inventory drawers and compartments, subject to the
6 scope of their duties. The locks or locking devices for podium drawers or compartments
7 containing or intended to contain a controlled inventory or confidential documents may have
8 keys, combinations or access codes in common with any similar drawer or compartment in that
9 podium or in any other podium or workstation. All keys, combinations and access codes ~~for any~~
10 podium shall be subject to the applicable key security and control provisions of Section 12395.

11 (5) Any opening in a podium that is not securely covered, such as a drop slot, shall be
12 configured in a manner that is intended to prevent any gambling chip, currency, coin, document
13 or object deposited into that opening from being removed through that opening or any other
14 opening that is not secured as provided in paragraph (3). The use of these openings shall be
15 limited ~~to one specific purpose~~ in order to prevent the improper commingling of unrelated items
16 or materials.

17 (6) ~~Access to an~~ The area immediately surrounding a podium ~~sufficient~~ shall be closely
18 monitored and controlled in order to provide for the security and safety of the podium and its
19 contents ~~shall be strictly controlled and~~. To the extent reasonably possible, any extended
20 presence of individuals in that area shall be limited to only those designated gambling enterprise
21 employees whose duties and responsibilities include or require the use of or access to the
22 podium. ~~Appropriate m~~ Measures shall be taken to prevent or limit the congregating or loitering
23 of patrons and non-designated gambling enterprise employees in the area immediately
24 surrounding a podium, which measures may include the use of appropriate barriers that do not
25 contravene or interfere with the provisions of paragraph (1) of this subsection, or placing the
26 podium in a “pit” area. ~~No~~ The interaction with a patron or patrons during any activities or
27 transactions ~~of any kind shall take place at or around~~ involving a podium ~~at any time~~ shall not

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1 take place at a podium; except that, in Tier I, II, and III cardrooms, a podium may be temporarily
2 used as a satellite cage while gambling operations are being conducted if the gambling
3 establishment has only one cage and only when that cage is closed [during work breaks, a count
4 process or a cage reconciliation] [for any reason], and provided further that all applicable
5 provisions of Section 12386 are complied with.

6 (7) A ~~log~~ record shall be maintained, either in writing or electronically, to document the
7 periods of operation of a podium and record the names of all gambling enterprise employees
8 designated as having authorization to access and use the podium during those periods. The ~~log~~
9 record must contain, at a minimum, the date, shift start and end times, each designated
10 employee's name and title, and the drawers and compartments for which the employee has been
11 granted access.

12 ~~(8)(A) Podium activity shall be reconciled, at a minimum, after each shift by the incoming~~
13 ~~and outgoing designated employees. If an imprest drawer is used for cash and gambling chips,~~
14 ~~each outgoing designated employee responsible for an imprest drawer shall reconcile his or her~~
15 ~~drawer to the imprest amount. All monetary transactions through a podium shall be~~
16 ~~appropriately summarized and documented, in writing, for each shift. The podium activity~~
17 ~~reconciliations shall be posted and reconciled to the general ledger at least monthly.~~

18 ~~(B) At least one random, unannounced count down or reconciliation of a podium shall be~~
19 ~~performed during each shift. The number of podiums subject to random reconciliation and the~~
20 ~~time of the random reconciliation during a shift shall be at the licensee's discretion. All random~~
21 ~~reconciliations shall be recorded separately from any reconciliation performed pursuant to~~
22 ~~subparagraph (A) and are not required to be posted to the general ledger.~~

23 ~~(C) If a controlled inventory is kept in a podium, reconciliations of that inventory shall be~~
24 ~~performed as provided in subparagraphs (A) and (B). Each podium monetary inventory shall be~~
25 individually reconciled as part of the cage reconciliations provided for in Section 12386, and
26 shall be itemized in those reconciliations.

27 (9) A podium may be used to store, hold or safeguard only those items necessary for or

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1 directly related to the conduct of gambling operations; ~~which may include, but is not necessarily~~
2 ~~limited to.~~ In addition to a monetary inventory, ~~and~~ those items may also include a controlled
3 inventory and confidential documents. A monetary inventory shall be segregated from and not
4 kept in the same drawer or compartment with any controlled inventory or confidential
5 documents. A podium shall not be used to hold, store, keep or safeguard any personal property
6 or possession of any gambling enterprise employee, patron, or any other person.

7 (10) The licensee shall establish ~~appropriate policies and procedures for the operation of~~
8 ~~podiums that, at a minimum, address the following:~~

9 ~~(A) The~~ a maximum value that may be assigned to each monetary inventory in a podium; and
10 the maximum combined value of all monetary inventories in that podium; and the maximum
11 combined value of all monetary inventories in all podiums in operation at any time.

12 ~~(B11) The assignment of~~ licensee shall, in writing, assign specified monetary inventories to
13 designated gambling enterprise employees ~~and~~, which assignment shall also specify the duties
14 and the responsibility of those employees for their assigned monetary inventory.

15 ~~(C12) The~~ licensee shall establish specific written procedures governing the sale or
16 distribution of gambling chips, and the disbursement of cash to patrons from a podium monetary
17 inventory by the designated gambling enterprise employee.

18 ~~(D) The disbursement of cash to patrons from a podium chip bank.~~

19 ~~(E13) The~~ licensee shall establish the content and limitation of any controlled inventory kept
20 in a podium.

21 ~~(F) Scheduled and random podium or individual monetary inventory count downs.~~

22 ~~(G) Scheduled and random controlled inventory reconciliations.~~

23 ~~(F) Compliance with Section 12404 of Article 4.~~

24 ~~(G) Training of designated gambling enterprise employees in accordance with the~~
25 ~~requirements of section 103.64 of Title 31 of the Code of Federal Regulations.~~

26 (b) The policies and procedures for all Tiers shall meet or exceed the following standards for
27 workstations:

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1 (1) A workstation shall be clearly visible for security and surveillance purposes, and shall not
2 be obstructed or shielded from view by any wall, partition, structure, curtain, sign, furnishing,
3 fixture, appurtenance, decoration or any other object. Workstations may be located and used in
4 any separate or reasonably segregable room, area or section of the gambling floor or gambling
5 establishment where gambling operations are conducted~~as may be necessary or required to~~
6 ~~provide a convenient location for gambling enterprise employees to perform some or all of their~~
7 ~~duties.~~

8 (2) A workstation shall be kept under continuous recorded video surveillance~~utilizing a~~
9 ~~dedicated video camera,~~ in accordance with the applicable provisions of Section 12396.

10 (3) A workstation may include drawers or compartments for storage, a flat writing surface
11 and access to a computer system. Each compartment of a workstation that is used for the storage
12 and distribution of a controlled inventory, or for the storage of confidential documents, shall be
13 covered in a manner that conceals its contents from view. Those drawer and compartment
14 covers shall have a locking mechanism which shall remain locked at all times, with the key
15 removed, whether the drawer or compartment is empty or in use, except when being accessed by
16 designated gambling enterprise employees in the performance of their duties. If a workstation
17 includes access to a computer system, appropriate security measures shall be employed to
18 prevent unauthorized access to or tampering with, the system.

19 (4) All locks or locking devices~~on a~~ for workstation drawers or compartments containing or
20 intended to contain a controlled inventory or confidential documents, shall be keyed differently
21 from the locks of any~~other workstation, or~~ podium drawer or compartment containing or
22 intended to contain a monetary inventory, or any other container, table or equipment in the
23 gambling establishment,~~and each drawer or compartment of a workstation that contains or is~~
24 ~~intended to contain a controlled inventory, or confidential documents, shall be keyed differently~~
25 ~~from any other drawer or compartment of that workstation.~~ The locks or locking devices for
26 each workstation drawer or compartment containing or intended to contain a controlled inventory
27 or confidential documents may have keys, combinations or access codes in common with any

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1 similar drawer or compartment in that workstation or in any podium or other workstation. All
2 keys, combinations and access codes for any workstation shall be subject to the applicable key
3 security and control provisions of Section 12395.

4 (5) Any opening in a workstation that is not securely covered, such as a drop slot, shall be
5 configured in a manner that is intended to prevent any item, document or object deposited into
6 that opening from being removed through that opening or any other opening that is not secured
7 as provided in paragraph (3). The use of these openings shall be limited ~~to one specific purpose~~
8 in order to prevent the improper commingling of unrelated items or materials.

9 ~~(6) Access to an~~ The area immediately surrounding a workstation ~~sufficient~~ shall be closely
10 monitored and controlled in order to provide for the security and safety of the workstation and its
11 contents ~~shall be strictly controlled and~~. To the extent reasonably possible, any extended
12 presence of individuals in that area shall be limited to only those designated gambling enterprise
13 employees whose duties and responsibilities include or require the use of or access to the
14 workstation. ~~Appropriate n~~ Measures shall be taken to prevent or limit the congregating or
15 loitering of patrons and non-designated gambling enterprise employees in the area immediately
16 surrounding a workstation, which measures may include the use of appropriate barriers that do
17 not contravene or interfere with the provisions of paragraph (1) of this subsection. ~~No~~ The
18 interaction with a patron or patrons during any activities or transactions ~~of any kind shall take~~
19 ~~place at or around~~ involving a workstation ~~at any time~~ shall not take place at a workstation,
20 except as may be necessary to provide reasonable accommodations to patrons in accordance with
21 the Americans with Disabilities Act.

22 (7) If a workstation is used for the storage and distribution of a controlled inventory, or for
23 the storage of confidential documents, a ~~log~~ record shall be maintained, either in writing or
24 electronically, to document the periods of operation of that workstation and record the names of
25 all gambling enterprise employees designated as having authorization to access and use the
26 workstation during those periods. The ~~log~~ record must contain, at a minimum, the date, shift
27 start and end times, each designated employee's name and title, and the drawers and

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1 compartments for which the employee has been granted access.

2 ~~(8) If a workstation is used for the storage and distribution of a controlled inventory,~~
3 ~~reconciliations of that inventory shall be performed as provided in paragraph (8) of subsection~~
4 ~~(a), and the licensee shall establish appropriate policies and procedures for the operation of~~
5 ~~workstations that, at a minimum, address the following:~~

6 ~~(A) The licensee shall establish the content and limitations of any controlled inventory.~~

7 ~~(B) The assignment of licensee shall, in writing, assign specified controlled inventories to~~
8 ~~designated gambling enterprise employees and, which assignment shall also specify the duties~~
9 ~~and the responsibility of those employees for their assigned controlled inventories.~~

10 ~~(C) The licensee shall establish specific written procedures governing the distribution of~~
11 ~~items from a controlled inventory by the designated gambling enterprise employee.~~

12 ~~(D) Scheduled and random workstation or individual controlled inventory reconciliations.~~

13 ~~(9) (A) Except as otherwise provided in subparagraph (C), a workstation may be used to~~
14 ~~store, hold or safeguard only items that are necessary for or directly related to the conduct of~~
15 ~~gambling operations; which may include, but are not necessarily limited to, a controlled~~
16 ~~inventory and confidential documents. No monetary inventory shall be kept on or in any~~
17 ~~workstation at any time.~~

18 (B) Customer service materials or items may be kept in or on a workstation. Customer
19 service materials and items may include, but are not necessarily limited to, game rule pamphlets,
20 printed house rules and other printed materials intended for public distribution or use, empty chip
21 racks and cup holders.

22 (C) A workstation shall not be used to hold, store, keep or safeguard any personal property or
23 possession of any gambling enterprise employee, patron, or any other person, except that suitable
24 accommodation may be provided only for the deposit and safeguarding of employee tips,
25 providing adequate measures are employed to prevent the comingling of employee tips with any
26 other items or materials stored or otherwise held in the workstation.

27 (c) A podium and a workstation may be combined in one unit, provided that all applicable

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1 requirements of subsections (a) and (b) are met, and the functions and use of each component are
2 separately maintained and controlled.

3 (d) If a licensee provides access to or the use of any podium or workstation, or any drawer or
4 compartment within any podium or workstation, to any third-party provider of proposition player
5 services (TPPPS) or their employees, that access or use shall be segregated from access or use by
6 any other entity or person, except as necessary for security purposes. If access is given to a
7 particular podium or workstation, that access shall be exclusive to the TPPPS and its employees.
8 If access to an in individual drawer or compartment within a podium or workstation is given, that
9 access shall be limited exclusively to that drawer or compartment and to that TPPPS and its
10 employees.

11 (e) Licensees shall establish and implement the standards specified in this section no later
12 than [the first day of the first full month six months following the effective date of this section].

13 NOTE: Authority cited: Sections 19840, 19841 and 19924, Business and Professions Code. Reference: Sections
14 19841, 19922 and 19924, Business and Professions Code.

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