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Nicole Rupert, Executive Secretary
Nevada Gaming Control Board
7 State of Nevada Way
Las Vegas, NV 89119
regcomments@gcb.nv.gov

Re: Joint Comments to Proposed Amendments to NGC Regulation 5.160 and Surveillance Standards for Restricted Licensees/Locations (“Proposed Surveillance Amendments”)

Dear Executive Secretary Rupert:

On behalf of both United Coin Machine Co. dba Century Gaming Technologies (“CGT”) and Golden Route Operations LLC (“GRO”) (collectively, “Companies”), we respectfully submit their joint comments as described below regarding the Proposed Surveillance Amendments.

The Companies greatly appreciate the time by the Nevada Gaming Control Board (“Board”) to review and propose enhancements to the Nevada Gaming Commission (“NGC”) Regulations and various standards. In carefully reviewing the various proposed amendments, the Company would like to offer some considerations and feedback to the Proposed Surveillance Amendments, which the Companies believe would further ameliorate the proposal.

Considerations for Proposed Surveillance Amendments

To help the Board with its analysis of the Proposed Surveillance Amendments and the impact to restricted licensees, the Company shares the following information:

- The Companies manage the restricted gaming operations at approximately 1,044 locations in Nevada (“Company Locations”), with 350 managed by CGT and 694 managed by GRO. Of those locations, while some have surveillance systems, the Companies do not believe that most are likely to meet the standards in the Proposed Surveillance Amendments.
- Certain of the Company Locations have conditions related to surveillance, but those conditions often provide for an alternative approach to monitor gaming. For example, a

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requirement that either the surveillance system and/or the mirror(s) are inspected within 60 days of license issuance.

- The costs of a surveillance system would vary depending on many factors, including the size of the location, the location's wiring/technical capabilities, etc. However, it would be a financial undertaking for restricted licensees.
- The level of technical sophistication (for physical properties and employees/owners) at restricted gaming locations across the state is widely varied. Technical sophistication can be more challenging for smaller, family-owned businesses. For those businesses, the costs and burden of implementing a surveillance system could be more pronounced and impactful than for a larger business with an established infrastructure.
- Certain grandfathered restricted locations are quite small and have older infrastructure. For those locations, as noted in the prior point, implementing a surveillance system could be more costly and burdensome than for newer locations with more space and more modern infrastructure.
- It would be challenging for many restricted locations to establish a surveillance system with monitors to display all gaming activities, largely due to space constraints but also given the varying levels of technical sophistication as noted above.

Suggestions to Address Practical Concerns

To address the above concerns, the Companies ask the Board to consider the following points:

- Removing the requirement for restricted licensees to have monitoring systems/capability;
- Grandfathering in existing locations unless there is a change event;
- Allowing a slot route operator to designate one of its employees to coordinate with the Board regarding surveillance requests for any of the slot route operator's locations; and
- Clarifying which components of 2.010 and Standard 12 apply to restricted licensees.

The Companies believe that these recommendations will help to substantially decrease the financial, technological, administrative, and training burden for restricted locations. At the same time, the recommendations are aimed at furthering the Board's goals of controlling gaming and protecting Nevada residents, while also helping to achieve compliance in consideration of location infrastructure, resources, and sophistication.

The Companies have jointly prepared some recommended changes to the Proposed Surveillance Amendments to capture these points. Those can be seen in the next section in **green**.

Proposed Revisions

2.010 Surveillance equipment.

[...]

- ~~13.~~ 14. Each video camera required by these standards must possess the capability of having its picture displayed on a video monitor and recorded.
- ~~14.~~ 15. The surveillance system must include sufficient numbers of monitors and recorders to simultaneously display and record multiple gaming and count room activities[,] and record the views of all dedicated cameras ~~[and motion activated dedicated cameras].~~
- ~~15.~~ 16. *The non-restricted licensee must immediately notify on-duty Enforcement Division personnel of any surveillance system malfunction that results in non-compliance with these standards.* Reasonable effort must be made to repair each malfunction of the surveillance system equipment required by these standards within seventy-two (72) hours after the malfunction is discovered. ~~[If a malfunction is not repaired within seven (7) days after it is discovered causing the licensee to be in non-compliance with these standards, the licensee must immediately notify the Enforcement Division via facsimile of the malfunction.]~~ *The non-restricted licensee must continue to provide the Enforcement Division with substantive system updates until compliance with the system requirements is achieved.*
- ~~16.~~ 17. In the event of a dedicated camera malfunction, the *non-restricted* licensee must immediately provide alternative *surveillance* camera coverage or other security measures, such as additional supervisory or security personnel, to protect the subject activity. ~~[If other security measures are taken, the licensee must immediately contact the Enforcement Division who will determine whether the other security measures are adequate.]~~
- ~~17.~~

STANDARD 14 RESTRICTED LICENSEES

As described herein, All restricted gaming establishments (“Restricted Locations”) must install a surveillance system to ensure that gaming areas and the cashier operation of the gaming machines are adequately supervised and monitored.

1. All new Restricted Locations that receive a restricted gaming license on or after [effective date of new standards] must comply with this Standard 14.
2. Each Restricted Location that has received a restricted gaming license before [effective date of new standards] will be required to come into compliance with this Standard 14 within thirty (30) days following: (a) a change of ownership or control, (b) the location closing for a period of six (6) or more months, or (c) the location’s operations are materially altered or it is remodeled.
3. Each Restricted Location grandfathered under NRS 463.161 is exempt from this Standard 14 unless the Restricted Location increases its square footage or fails to preserve its grandfathered status under NRS 463.161, in which case, the Restricted Location must come into compliance with this Standard 14 within thirty (30) days of such change.
4. Restricted Locations ~~The licensee~~ must designate an employee with working knowledge of the surveillance system to provide access to the equipment and surveillance coverage upon request within 24 hours. For avoidance of doubt, if the Restricted Location’s gaming operations are managed by a licensee under NRS 463.018, the licensed operator of a slot machine route may designate an employee to comply with this section.
5. Additional guidance for Restricted Locations licensees also must comply with is

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~~provided in~~ Subsections (7) and (11) through (14) of 2.010 Surveillance Equipment,
as well as Sections (3), (5), and (7) of ~~and~~ Standard 12 Recording Standards.

We appreciate the Board's attention to this matter and time to consider the above. We are happy to discuss any questions or concerns. Please feel free to contact me at 702-599-8073 or erica.okerberg@gtlaw.com.

Best regards,

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