

Staffing and Functions of a Satellite Cage

Accounting and Internal Controls

Temporary Amendments: N.J.A.C. 19:45-1.11, 1.12 and 1.14

Authority: N.J.S.A. 5:12-63, 69, 70, 99 and 100

The temporary rules follow:

Summary

N.J.A.C. 19:45-1.11(b)7 currently requires a satellite cage to be supervised by a casino key employee. When a satellite cage is used for the limited function of redeeming gaming chips, however, this limited usage often does not justify the expense of staffing the location with two employees. Accordingly, casino licensee Borgata Hotel, Casino & Spa requested that a single person licensed as a casino employee be permitted to operate a satellite cage in such a situation.

This temporary adoption permits a single person licensed as a casino employee to operate a satellite cage, provided that certain conditions are met. First, the satellite cage must be located in or adjacent to an area of the casino operating under revised supervision pursuant to N.J.A.C. 19:45-1.12(e) and (f), and the satellite cage reduced staffing must be included in the revised supervision plan. See temporary N.J.A.C. 19:45-1.11(b)7iii(1). Secondly, no cage functions requiring a supervisor may be performed. See temporary N.J.A.C. 19:45-1.11(b)7iii(2). This condition, among other things, prohibits the substitution, redemption and consolidation of patron checks (N.J.A.C. 19:45-1.26), refunds of patron deposits (N.J.A.C. 19:45-1.24), acceptance and verification of wire transfers (N.J.A.C. 19:45-1.24A), and the issuance or redemption of slot counterchecks (N.J.A.C. 19:45-1.25A). Additionally, if any gaming chips found to be missing from such a satellite cage, the set of gaming chips in question must be removed from active play until or unless they are recovered or otherwise accounted for. This provision should help to prevent attempts to redeem stolen gaming chips. See temporary N.J.A.C. 19:45-1.11(b)7iii(3).

The amendment to N.J.A.C. 19:45-1.12(e)9 permits satellite cage personnel to be included in a plan for revised supervision, if the conditions in N.J.A.C. 19:45-1.12(f)3 and N.J.A.C. 19:45-1.11(b)7iii are satisfied. N.J.A.C. 19:45-1.14(g), which authorizes satellite cages, is temporarily amended to include a cross-reference to the above new optional staffing arrangement and functional limitations.

Full text of the temporary adoption follows (additions indicated in boldface **thus**; deletions indicated in boldface brackets [thus]):

19:45-1.11 Casino licensee's organization

(a) (No change.)

(b) In addition to satisfying the requirements of (a) above, each casino licensee's system of internal controls shall include, at a minimum, the following departments and supervisory positions. Each of the departments and supervisors required or authorized by this section (a "mandatory" department or supervisor) shall cooperate with, yet perform independently of, all other mandatory departments and supervisors of the casino licensee. Notwithstanding the foregoing, a department or supervisor of a casino licensee that is not required or authorized by this section may operate under or in conjunction with a mandatory department or supervisor unless the Commission subsequently disapproves such operation as being inconsistent with the standards contained within N.J.S.A. 5:12-99a(3) and (a) above.

Mandatory departments and supervisory positions are as follows:

1. - 6. (No change.)

7. A casino accounting department supervised by a person referred to herein as a controller. The controller shall be responsible for all casino and casino simulcasting facility accounting control functions including, without limitation, the preparation and control of records and data, the control of stored data, the control of unused forms, the

accounting for and comparison of operational data and forms, and the control and supervision of the cashiers' cage, any satellite cages, the soft count room and the hard count room.

i. The soft count room and hard count room shall each be super-vised by a casino key employee, who shall be responsible for the supervision of the soft count or hard count in accordance with N.J.A.C. 19:45-1.33 and 1.43, respectively.

ii. A casino licensee that operates more than one casino room within its casino hotel facility may be required to maintain a separate cashiers' cage in each casino room. Each cashiers' cage shall be supervised by a casino key employee referred to herein as a cage manager. The cage manager shall report to the controller and shall be responsible for the control and supervision of cage and slot cashiers, casino clerks and the cage functions set forth in N.J.A.C. 19:45-1.14, 1.15, 1.34 and 1.35.

iii. If a casino licensee elects to operate one or more satellite cages, each satellite cage shall be supervised by a casino key employee in accordance with a supervisory structure approved by the Commission that is consistent with the provisions of N.J.A.C. 19:41-1.1(a)lix; **provided however, that a satellite cage may be operated by a single person licensed as a casino employee if:**

(1) The satellite cage is located in or adjacent to a area of the casino operating under revised supervision pursuant to N.J.A.C. 19:45-1.12(e) and (f), and the satellite cage staffing is included in the revised supervision plan; and

(2) No cage functions requiring a supervisor are performed.

8. Notwithstanding the [foregoing] **requirements of b(7) above**, a casino licensee may choose, in its discretion, as to each cashiers' cage in its casino hotel facility, to:

i. - iv. (No change.)

(c) – (h) (No change.)

19:45-1.12 Personnel assigned to the operation and conduct of gaming

(a) – (d) (No change.)

(e) Notwithstanding the provisions of (c) above, a casino licensee may implement a plan for revised supervision by floorpersons, poker shift supervisors, pit bosses, [or] slot shift managers **or satellite cage personnel**. A plan for revised supervision of table games shall not include any gaming tables at which the cards shall be used for more than 24 hours pursuant to N.J.A.C.

19:46-1.18(g)7. In any plan for revised supervision:

1. - 6. (No change.)

7. One floorperson assigned to poker may supervise not more than 12 poker tables if the poker shift supervisor is supervising only poker tables and no floorperson assigned to poker has any responsibilities for seating players; [and]

8. If a casino licensee chooses to establish slot and keno operations in the same department, as permitted under N.J.A.C. 19:45-1.11(b), a slot shift manager may simultaneously assume the responsibility of keno supervisor[.] ; **and**

9. A satellite cage may be operated by a single person licensed as a casino employee if the conditions in (f)3 below and in N.J.A.C. 19:45-1.11(b)7iii are satisfied.

(f) The casino manager or table games shift manager shall notify the Commission and the Division no later than 24 hours in advance of implementing or changing any plan for revised supervision for table games, and the slot shift manager or keno supervisor shall provide such notification for keno, provided, however, that notice may be provided less than 24 hours in advance in circumstances which are emergent or may otherwise not reasonably be anticipated.

1. - 2. (No change.)

3. Any notice of a plan for reduced supervision of a satellite cage shall include, without limitation, the following information:

i. The standard staffing level required for the satellite cage and the proposed variance therefrom;

ii. The start date and time, and the duration, of the revised supervision; and

iii. The basis for the decision to revise the number of supervisory personnel at the satellite cage, which shall include any relevant factors which demonstrate that proper operation and effective supervision of the satellite cage be maintained, including, as applicable:

(1) A showing that the revised satellite cage supervision is justified by a reduced volume of patrons and gaming activity play at the specified times in the casino or casino simulcasting facility; and

(2) Any other facts or circumstances which establish that a revision in the number of supervisory personnel is appropriate.

(g) – (k) (No change.)

19:45-1.14 Cashiers' cage; satellite cages; master coin bank; coin vaults

(a) - (f) (No change.)

(g) Each establishment may also have one or more "satellite cages" separate and apart from the cashiers' cage, but in or adjacent to a casino or casino simulcasting facility, established to maximize security, efficient operations, or patron convenience and comfort and designed and constructed in accordance with N.J.A.C. 19:45-1.14(c). Subject to Commission approval, a satellite cage may perform any or all of the functions of the cashiers' cage **unless it is operated by only a single person licensed as a casino employee pursuant to N.J.A.C. 19:45-**

1.11(b)7iii. The functions which are conducted in a satellite cage shall be subject to the applicable accounting controls set forth in this chapter.

(h) - (k) (No change.)