

Sec. 12-865-18. Requirements for Live Dealer and Peer-to-Peer Online Casino Gaming

(a) All live online casino gaming shall be conducted in a secure live game environment, located in the state, not accessible by the public, and accessed through an electronic wagering platform that complies with section 12-865-13 of the Regulations of Connecticut State Agencies. Notwithstanding the other provisions of this subsection, simulcasting of live online casino gaming may be conducted in another state within the United States through March 31, 2022 and broadcast by the online gaming operator licensee so long as the entity simulcasting the live online casino game holds an active gaming license from the state where the simulcasting originates and an online gaming service provider license pursuant to section 12-865-6 of the Regulations of Connecticut State Agencies and the live online casino gaming servers are located in accordance with section 12-865-13 of the Regulations of Connecticut State Agencies.

(b) No in-person wagering of patrons physically located where the live online casino game is taking place shall be permitted during a live online casino game. Live online casino gaming shall be offered exclusively to patrons accessing the game through the electronic wagering platform.

(c) An online gaming operator shall submit all live online casino games, including gaming equipment, proposed for use by any online gaming operator to an independent testing laboratory licensed by the department which lab shall review and certify such game in accordance with the standards set forth in section 12-865-15 of the Regulations of Connecticut State Agencies. The online gaming operator is responsible for all costs associated with testing and obtaining such approvals.

(d) All live online casino games for proposed use shall meet or exceed the technical standards specified in sections 12-865-13 and 12-865-15 of the Regulations of Connecticut State Agencies and any other technical standards established pursuant to section 12-865-3(n) of the Regulations of Connecticut State Agencies. Master wagering licensees and online gaming operators are prohibited from offering any live online casino game without independent testing laboratory certification and written approval by the department.

(e) The master wagering licensee and its online gaming operator shall place the electronic wagering platform, servers, or other equipment related to live online casino games that is capable of receiving internet wagers in this state in accordance with sections 12-865-13(b), (c), and (bb) of the Regulations of Connecticut State Agencies.

(f) The online gaming operator providing live online casino games shall adopt, implement, and maintain all technical standards specified in this section and sections 12-865-13 and 12-865-15 of the Regulations of Connecticut State Agencies, including the requirements for live online casino games, and any other technical standards established pursuant to section 12-865-3(n) of the Regulations of Connecticut State Agencies.

(g) The live game environment shall be clearly defined and demarcated and have appropriate physical security controls. Secure areas, live game consumables, and live game equipment shall be protected by entry controls and security procedures to ensure that only authorized employees are allowed access. Live game equipment and consumables shall be subject to access controls, both physical and logical, that prevent unauthorized access to the live game equipment and consumables. Live game environment security shall include,

but is not limited to, the following:

(1) Access to the areas where the live online casino games occur, the whole of the area near the live game equipment, and the areas where consumables are stored or prepared for use shall be protected by physical barriers and security systems;

(2) Delivery, loading areas, and other access points to the facility where the live online casino games occur or consumables may be stored or prepared for use shall be controlled and isolated from operations areas to avoid access by unauthorized individuals;

(3) The live game equipment and consumables shall be subject to access controls, both physical and logical, that prevent unauthorized access to the live game equipment and consumables; and

(4) Access points shall be actively monitored by security staff.

(h) The online gaming operator shall install, maintain, and operate a surveillance system that has the capability to monitor and record continuous unobstructed views of all live game play and areas where consumables are stored or prepared for use.

(i) A continuous recording shall be made of all the live online casino games played which includes, but is not limited to, all of the following:

(1) Identifiable and distinguishable information necessary to adequately reconstruct each game, consistent with any required technical standards established by the department under 12-865-3(n) of the Regulations of Connecticut State Agencies. The live online casino game recall shall display information including, but not limited to, all of the following, as applicable:

(A) The date and time the game was played.

(B) The denomination played for the game, if a multi-denomination game type.

(C) The display associated with the final outcome of the game, either graphically or by a clear text description.

(D) The funds available for wagering at the start of play and at the end of play.

(E) Total amount wagered, including any complimentary.

(F) Total amount won.

(G) Rake, commission, or fees collected.

(H) The results of any patron choices involved in the game outcome.

(I) The results of any intermediate game phases, such as double-up gamble or bonus feature games.

(J) If a progressive jackpot or incrementing jackpot was won, an indication that the jackpot was awarded.

(K) Any patron advice that is offered to the patron for games with skill.

(2) Information necessary to determine the date and time of each live online casino game to an accuracy of one second relative to the clock used by the electronic wagering platform.

(3) Information necessary to determine the sequence of live interactive online games relative to each other.

(4) Procedures shall be in place to ensure that the recording meets all the following minimum conditions:

(A) Covers the defined live game environment and areas where consumables are stored or prepared for use with sufficient detail to confirm whether all game rules and relevant procedures were followed and to identify any discrepancies.

- (B) Is captured in such a way that precludes interference or any deletion.
- (C) Is actively monitored by surveillance personnel.
- (D) Can be reviewed by the online gaming operator and the department in the event of a patron complaint or dispute.

(E) Is kept for at least ninety days or as otherwise determined by the department. Recordings shall be maintained of any event that is subject to any investigation until the completion of the investigation.

(j) The online gaming operator offering a live online casino game shall utilize simulcast control servers for recording all gaming activity and results. The online gaming operator may use the operator's own surveillance camera and split live feed to the simulcast control servers, or there may be a separate network of video involved. The simulcast control servers shall do the following, including, but not limited to:

(1) Provide the patron with real-time audio and visual access to the live game being played, which shall include, but is not limited to, the following:

- (A) Any information required in the technical standards;
- (B) The actions of the gaming attendant and, where applicable, other patrons;
- (C) Date and time at the live game studio;
- (D) Location of the live game studio;
- (E) Game identification, and the table number.

(2) Provide each patron with an equivalent quality video and audio feed. This equivalence shall be measured and verified whenever communications are initiated, including reconnection due to signal interruptions or re-initiation when the signal was severed. A minimum signal connection requirement shall be established, enforced and disclosed to the patron.

(3) Prevent anyone from accessing the live game outcome prior to finalizing a wager.

(4) Record internet game results before posting to the electronic wagering platform.

(5) Be equipped with a mechanism to void game results, if necessary. The conditions under which a game may be voided shall be clearly detailed in internal controls.

(k) The online gaming operator shall assign a unique asset number for each live game equipment item. The online gaming operator shall maintain an inventory of each live game equipment item. The online gaming operator shall provide the inventory to the department upon request. The inventory of live game equipment shall include the following information:

- (1) The asset number assigned by the online gaming operator;
- (2) The type of game for which the live game equipment item is designed and used;
- (3) The location of each live game equipment item; and
- (4) The manufacturer, supplier, or vendor of the live game equipment item.

(l) Unless otherwise authorized by the department, approved live game equipment and consumables may only be installed and used to provide live online casino games to an online gaming operator. Access to live game equipment and consumables shall be strictly controlled to prevent unauthorized access.

(m) The online gaming operator shall provide a secure location for the placement, operation, and usage of live game equipment, including simulcast control servers, gaming servers, and communications equipment. Security policies and procedures shall be in place and reviewed periodically to ensure that risks are identified and mitigated. Live game

equipment shall meet all of the following minimum requirements:

(1) Live game equipment shall be installed according to a defined plan and records of all installed live game equipment shall be maintained.

(2) Live game equipment shall be sited or protected to reduce risk from all of the following, without limitation:

- (A) Environmental threats and hazards.
- (B) Opportunities for unauthorized access.
- (C) Power failures.
- (D) Other disruptions caused by failures in supporting utilities.

(3) Access to the live game equipment by the gaming attendant, such as a dealer or croupier, shall be controlled by a secure logon procedure or other secure process to ensure that only authorized gaming attendants are allowed access. All modifications to configuration settings of the live game equipment shall follow a secure process and be performed in accordance with approved change management and related release note processes.

(4) A patron session, where supported by live game equipment, shall be initiated by the gaming attendant logging in to the attendant's user account using the attendant's secure username and password or an alternative means for the gaming attendant to provide identification information. The user session shall meet the following minimum requirements:

(A) All available options presented to the gaming attendant shall be tied to the gaming attendant's user account.

(B) If the live game equipment does not receive input from the gaming attendant within five minutes, or a period specified by the department, the patron session shall time out or lock up, requiring the gaming attendant to re-establish the gaming attendant's login in order to continue.

(5) Live game equipment shall be correctly maintained, inspected and serviced at regular intervals by designated staff to ensure that it is free from defects or mechanisms that could interfere with its proper operation or integrity.

(6) Prior to disposal or re-use, live game equipment containing storage media shall be checked to ensure that any licensed software and other sensitive information has been removed or securely overwritten, not just deleted.

(7) Since the live game wagering will be conducted by the online gaming operator and the conduct of the live online casino games will flow through the electronic wagering platform, all applicable technical standards in this section and section 12-865-13 of the Regulations of Connecticut State Agencies or technical standards established pursuant to section 12-865-3(n) of the Regulations of Connecticut State Agencies are applicable to live game equipment. The online gaming operator shall adopt, implement, and maintain technical standards and controls that meet or exceed those adopted in sections 12-865-13 and 12-865-15 of the Regulations of Connecticut State Agencies and any other technical standards established pursuant to section 12-865-3(n) of the Regulations of Connecticut State Agencies. An online gaming operator shall amend the operator's internal controls, as needed, to address the various aspects of live online casino games.

(n) Online gaming operators shall ensure that all relevant technical standards for live

online casino gaming are adopted, implemented, and maintained within their internal controls and procedures.

(o) Integration testing of live game equipment to all electronic wagering platforms shall be performed by an independent test lab licensed by the department. The online gaming operator shall provide the department with all integration testing results.

(p) Online gaming operators shall submit products that require approval to a licensed independent test laboratory for testing to Connecticut's technical requirements. The independent test lab shall provide the online gaming operator with the results of testing and a certification letter upon completion of its evaluation. Live game equipment shall be tested in accordance with the testing standards as set forth in section 12-865-19 of the Regulations of Connecticut State Agencies and any other technical standards established pursuant to section 12-865-3(n) of the Regulations of Connecticut State Agencies. Live game equipment to be tested includes, but is not limited to, the following:

(1) Live dealer games.

(2) Live game systems.

(3) All live game equipment used in conjunction with card, roulette, dice, and wheel games, such as automated card readers, roulette wheels, and automated dice shakers and throwers, shall be tested as part of the applicable game.

(4) Card shufflers.

(q) The online gaming operator shall submit the certification letter received from the licensed independent testing laboratory as a part of the application for product approval. Such application shall be submitted to the department in a form and manner prescribed by the commissioner.

(r) Consumables used by online gaming operators providing live online casino games shall meet minimum standards, specifications, and requirements prescribed the department. General requirements for live game consumables include, but are not limited, to all the following:

(1) Procedures shall be implemented for tracking the inventory of consumables from receipt, through storage, installation, use, retirement, and destruction. All consumables shall have an associated audit trail showing which designated staff had access to the consumables at any given time for any given operation.

(2) Inspections shall be performed on consumables before they are placed in operation. Periodic random inspections shall be performed on the consumables while in use, from disbursement to retirement.

(3) Used consumables shall be destroyed in a manner which prevents their accidental re-use in live online casino games, and which puts them permanently beyond use. Consumables that are the subject of any investigation shall be retained until completion of the investigation.

(4) Procedures shall be in place to ensure consumables are stored in secure locations and are properly accounted for and controlled.

(s) All playing cards utilized in the live online casino games shall comply with all of the following specifications:

(1) Unless otherwise determined by the department, all decks of cards shall be one complete standard deck of fifty-two cards in four suits. The four suits shall be hearts,

diamonds, clubs, and spades. Each suit shall consist of all the following numerical cards:

- (A) Two to ten.
- (B) A jack.
- (C) A queen.
- (D) A king.
- (E) An ace.

(2) The backs of each card in a deck shall be identical and no card shall contain any marking, symbol, or design that will enable an individual to know the identity of any element printed on the face of the card or that will differentiate the back of that card from any other card in the deck.

(3) All edges shall be perfectly square with each side at a precise ninety degree angle to each adjacent side of the card.

(4) The radius of all four corners shall be exactly the same.

(5) Unless otherwise approved by the department, the decks of cards utilized by the online gaming operator shall be unique to the conduct of live online casino games in Connecticut and distinct from other decks of cards utilized by the online gaming operator in other jurisdictions including a reservation.

(6) All new card decks shall arrive at the live game environment wrapped in cellophane, shrink wrap packaging, or with a tamper-resistant security seal.

(7) The card supplier's identification name shall be placed on each box.

(t) Unless otherwise approved by the department, all dice utilized by an online gaming operator shall comply with all of the following specifications:

(1) Each die shall be formed in the shape of a perfect cube and of a size no smaller than 0.750 inches on each side nor larger than 0.775 inches on each side.

(2) Unless otherwise approved by the department, the dice utilized by the online gaming operator or online gaming service provider shall be unique to the conduct of live online casino games in Connecticut and distinct from other dice utilized by the online gaming operator in other jurisdictions.

(3) Each die shall be transparent and made exclusively of cellulose, except for the following:

- (A) Spots.
- (B) Name, trade name, or logo of the online gaming operator.
- (C) Serial number or letters, or both.

(4) The surface of each side of the die shall be perfectly flat and the spots contained in each side of the die shall be perfectly flush with the area surrounding the spots.

(5) The edges and corners of each die shall be perfectly square and form ninety degree angles with each adjacent side.

(6) The texture and finish of each side shall be identical to the texture and finish of all other sides.

(7) The weight of each die shall be equally distributed throughout the cube, and no side of the cube may be heavier or lighter than any other side of the cube.

(8) Each die shall have six sides bearing white circular spots from one to six, respectively, with the diameter of each spot equal to the diameter of every other spot on the die.

(9) Each die shall have spots arranged so that all the following provisions are satisfied:

- (A) The side containing one spot is directly opposite the side containing six spots.
- (B) The side containing two spots is directly opposite the side containing five spots.
- (C) The side containing three spots is directly opposite the side containing four spots.

(10) Each spot shall be placed on the die by drilling, or the equivalent, into the surface of the cube and filling the drilled-out portion with a compound that is equal in weight to the weight of the cellulose drilled out and that forms a permanent bond with the cellulose cube.

(u) Each table used for live online casino games shall contain a symbol imprinted on it that clearly indicates that the online gaming operator is offering the game for play in Connecticut.

(v) In connection with approving game rules and live online casino game internal controls, the department may prescribe specifications for any other consumable, the requirements for which are not set forth in this section, that will be utilized to conduct live online casino games. Such specifications may include the size, weight, appearance and operation of such consumable in order to ensure the integrity of gaming.

(w) Soft launch procedures shall be conducted by the department for each new interactive online game that an online gaming operator offers. The soft launch shall provide an opportunity for the online gaming operator to demonstrate to the department that live game staff are trained in the performance of their duties, all systems perform as expected under the stress of live gaming, and operational and revenue reporting internal controls and procedures are effective.

(x) Prior to commencing a soft launch, the online gaming operator shall:

(1) Schedule a site inspection with the department to ensure adequate security and surveillance measures are in place.

(2) Provide a URL and access credentials for a production environment test account to include all live online casino games offered in the live game environment.

(3) Schedule pre-launch testing with the department of all games to demonstrate performance of the games and that staff are adequately trained in the performance of their duties.

(4) Provide the department with a list of the live online casino games to be offered during soft launch and the schedule for each game.

(5) Provide the department with a list of personnel responsible for overseeing the soft launch. The list shall identify the name or names of the individuals and the contact information and area of responsibility for each individual.

(6) Provide read-only remote access to the electronic wagering platform or platforms and any additional live game systems for designated department personnel.

(7) Provide the department with sample reports of wins and losses by gaming date and month.

(8) Provide the department with a list of games, software, hardware, equipment, and consumables to be utilized to conduct live online casino games.

(9) Provide the department with all manuals and additional documents for live game equipment and other devices used to conduct live online casino games.

(10) Schedule an inspection of any remote game server hardware not located in the live game environment.

- (11) Obtain written approval from the department to commence soft launch.
- (y) During a soft launch, the online gaming operator shall:
 - (1) Offer each live game type for play for a minimum of three hours each day.
 - (2) Demonstrate opening, closing, card shuffling, and consumable change procedures for each live game offered for play during soft launch.
 - (3) Demonstrate resolution of anomalous events and dealer mistakes in accordance with approved internal controls and procedures.
 - (4) Demonstrate acceptable minimum latency between the audio/video signal of each live online casino game and the user interface to ensure the performance and integrity of games.
 - (5) Demonstrate that all live game activity is properly recorded by simulcast control servers.
 - (6) Demonstrate performance of the tipping functionality with the electronic wagering platforms, if applicable.
 - (7) Demonstrate performance of barcoded card counting or reading machines and dice readers by conducting tests under department observation.
 - (8) Demonstrate performance of roulette wheels and balls by conducting tests under department observation.
 - (9) Demonstrate performance of dice shakers and throwers by conducting tests under department observation.
 - (10) Demonstrate that cards, dice, and other consumables meet specifications established by the department by conducting tests under department observation.
 - (11) Demonstrate that the electronic wagering platform and live game system properly prevent past posting.
 - (12) Demonstrate knowledge, skills and abilities of staff assigned to monitor live game play from a central control room.
- (z) The online gaming operator operating live online casino games shall provide the department with continual and unrestricted access to the live gaming production environment, physical location, and live game equipment and consumables for any reason the department determines necessary to regulate, license, enforce, and audit the conduct of live online casino games. This shall include, but is not limited to, access to all live audio/video feeds required or otherwise implemented under this section, and all entry and exit points.
- (aa) Each online gaming operator that intends to conduct live online casino games shall amend the operator's internal controls to include live online casino games. The internal controls shall ensure all the following, without limitation:
 - (1) All live online casino game security issues, significant system failures, and incidents are responded to and reported to the department within twenty-four hours.
 - (2) Any person is prevented from tampering with or interfering with the operation of any live online casino games or live game equipment.
 - (3) All live interactive online games have been approved by the department prior to being offered to any patron by an online gaming operator.
 - (4) Staff of the online gaming operator, including game attendants:
 - (A) Attend and receive adequate training to provide live online casino games in a fair

and honest manner according to documented procedures and game rules. Evidence of initial training and periodic refresher training shall be maintained.

(B) Receive training on and reminders of any physical behavior which is prohibited or mandated. The training received shall be reinforced by supervisory staff.

(5) Shift rotations, shift patterns and staff allocation are documented, including how game attendants are allocated to tables or games (i.e., without prior knowledge of which tables or games they will be serving and with their time-on-game set at a level to deter harmful relationships being developed) and changes in game attendants during exceptional circumstances.

(6) Patrons who reject a table or a game and re-apply for another within the same game type on a consistent basis until they arrive at their preferred table or game are reasonably detected and prevented from wagering.

(7) Records are maintained which allow staff records to be audited and investigated if staff members are directly involved in a chain of events or if their presence in a particular place or at a particular time is crucial to understanding a chain of events.

(8) The hiring and termination of staff follow defined processes and are properly documented.

(9) Supervisory employees are always present when live online casino games are taking place.

(10) Staffing logs are maintained for each table and game.

(11) Anomalous events which may occur during live online casino games are documented and understood by staff, including, but not limited to, all of the following:

(A) Specialized device or physical randomness device malfunctions, including incorrect outcome detection.

(B) Dropped cards.

(C) Misdeals.

(D) Re-spins.

(E) Aborted games.

(F) Table and game closures.

(12) Consistent card shuffling procedures are in place, including a verification of the card count, frequency of shuffling, and cases for reshuffling. The shuffling of cards shall be logged.

(13) A single member of staff would not be able to undertake all duties concerning game management and there is adequate segregation of responsibilities prior to play, during play and after play.

(14) Defined procedures are in place to address patron disconnection or any video, voice, or data stream disruptions during a live game and those procedures are readily accessible and clearly communicated to all patrons.

(15) Wagers placed on live online casino games follow defined procedures, including, but not limited to, all of the following:

(A) When wagers are placed by verbal instruction, the content of the wager is communicated back and acknowledged by the patron before the wager is confirmed.

(B) When a game attendant is receiving wagers indicated by the patron, a clear indication or notification if the wager has been accepted or rejected (in full or in part) is provided to

the patron.

(C) The winning patron is notified of the patron's win, including the amount won, after the completion of the game and the patron's account balance is updated either immediately or once the patron exits the game.

(16) Variations in the operation of card shufflers and shoes, roulette wheels, dice shakers and throwers or other live game equipment are incorporated into the game procedures to maintain randomness. This equipment shall have a level of randomness consistent with strict regulation provided in land-based casinos to ensure the equipment's fairness and integrity.

(17) Card shoes and similar specialized devices and physical randomness devices are tamperproof once they have been loaded to preclude interference prior to and during play.

(18) Any specialized devices and physical randomness devices are periodically inspected and tested for reliability and integrity. Logs and records shall be maintained of all inspections.

(19) Patrons are informed when the manual operation mode of a specialized device is activated. Any use of the manual operation mode shall be tracked for further review.

(20) Specialized devices and physical randomness devices which show an unacceptable level of errors are identified and replaced.

(21) Game logs and records which collate game events into statistics are generated, reviewed, and analyzed for trends, irregularities, and errors relating to all of the following:

- (A) Game performance.
- (B) Staff or locations in the live game environment, including supervisors.
- (C) Shifts.
- (D) Procedure violations.
- (E) Other incidents.

(22) Live gaming is monitored to ensure that all live online casino games are being conducted in accordance with internal controls and procedures and in a fair and honest manner.

(23) Live gaming and all live online casino game transactions are properly accounted for and recorded.

(24) Collusion between a patron and a dealer is detected and prevented.

(25) Change control processes, which include related release note reporting format and processes, are adopted, implemented, and maintained in a manner approved by the department.

(26) Live game equipment and consumables are inspected before being placed in operation with periodic random inspections performed thereafter.

(27) Past posting of wagers is prevented.

(28) Tips, if allowed by the online gaming service provider or the online gaming operator, are properly processed and accounted for. Tipping procedures shall adequately mitigate the risk of collusion between a patron and a dealer, which shall include, but is not limited to, the pooling of all tips received.

(29) The rules of each live interactive online game shall be submitted to the department for review and approval.

(30) The online gaming operator may only conduct live online casino games that are

authorized under the act and 12-865-15 and 12-865-18 of the Regulations of Connecticut State Agencies and approved by the department.

(31) The department will review the listing provided by the online gaming operator of all live game equipment and consumable items that will be utilized in the conduct of live online casino games, which includes the supplier or vendor for each item, to determine which entities require an online gaming service provider license. The following are generally considered internet gaming suppliers related to the conduct of live online casino games:

- (A) Online gaming operators.
- (B) Live game equipment and game suppliers.
- (C) Card, dice, and other consumable suppliers.
- (D) Suppliers of card shufflers and shoes, automated card readers, and automated dice shakers and throwers.
- (E) Roulette wheel suppliers (both automated and non-automated).

(bb) The online gaming operator shall provide an organizational chart of personnel with responsibility over the conduct of live online casino games for the department to determine which positions will require an occupational license. Occupational licenses are generally required for dealers, security and surveillance personnel, and live online casino game supervisors and management personnel.

(Effective February 1, 2022)