

Moore, Shannon (GMB)

From: Rules Coordinator (GMB)
Sent: Tuesday, May 6, 2025 9:07 AM
To: Moore, Shannon (GMB)
Subject: FW: Webform submission from: Request for public comment

Hi Shannon,

This just came in as comment. Can we please add it to the packet for the commission meeting this week?

Thank you,
Tricia

From: Washington State Gambling Commission <no-reply@wsgc.wa.gov>
Sent: Tuesday, May 6, 2025 7:54 AM
To: Rules Coordinator (GMB) <rules.coordinator@wsgc.wa.gov>
Subject: Webform submission from: Request for public comment

External Email

Submitted on May 6, 2025 - 7:53am

Submitted by: Anonymous

Submitted values are:

Select a Topic

Petition for Rule Change: Centralized Surveillance

Your Name

Anonymous SurveillanceObserver

Organization

Maverick Gaming

Comments

Imagine working in surveillance, but the role you're tasked with feels disconnected from its actual purpose. You're expected to:

Always be present, to ensure someone is seen to be watching.

"Watch everything"—an impossible expectation in any real setting.

Report only the incidents management is comfortable hearing about, while turning a blind eye to serious or inconvenient issues.

Investigate non-issues or low-risk behaviors, simply to appear productive or maintain optics.

In such an environment, the surveillance role stops being about its true function—ensuring safety, fairness, and integrity. It becomes a symbolic performance: a staged display where the illusion of control matters more than actual oversight.

This isn't just inefficient—it's harmful. And the harm runs deep.

1. Responsibility Without Power

You're held accountable if something goes wrong. Yet, you often lack the authority or institutional support to act on what you observe. This mismatch creates a dangerous imbalance where the weight of responsibility sits squarely on your shoulders, but your hands are tied.

2. Mental and Ethical Conflict

Your training emphasizes rule enforcement, objectivity, and truth. But in practice, you're pressured to overlook misconduct or divert attention to less sensitive matters. This leads to an ongoing internal conflict between what you know is right and what you're told to do. Over time, this disconnect becomes mentally exhausting.

3. Moral Burnout

Constant exposure to unfairness—and being expected to ignore it—gradually erodes your personal ethics. What began as a job rooted in justice begins to feel like complicity. It chips away at your motivation, empathy, and sense of purpose. Eventually, many in the role grow jaded or disengaged.

4. Treated Like a Tool, Not a Professional

Rather than being respected as a skilled observer with a critical role, you become a placeholder—just a “warm body” in the chair to fulfill compliance requirements. You're isolated in a cramped, windowless room with outdated equipment, allowed out for only 30 minutes per shift, and working long hours for barely more than minimum wage. The expectation is not that you think critically or act decisively—but that you maintain the appearance that someone is watching.

5. A Mandated Role, Diminished

What makes this even more damaging is that surveillance is a state-mandated role, with state-mandated responsibilities. Your reports don't just vanish into the void—they may become part of criminal cases or court records. The expectation is high, yet the conditions are demoralizing.

Casino surveillance is not equivalent to retail loss prevention. It operates under stricter regulatory scrutiny and legal significance. To treat it the same—or worse, to reduce it to a box-checking exercise—is to undermine the integrity of the entire system.

A Turning Point

We've stood by the industry, helping to keep it running through every challenge. And now, we're being told that establishments must close—not because of performance or demand—but because centralized surveillance isn't allowed?

This decision threatens to cut our surveillance jobs by half, maybe even more.

Since the original pilot program, we've already watched staffing requirements steadily erode:

Fewer floor supervisors required

Elimination of two levels of gaming supervision

Removal of the single property-specific accounting, security, and surveillance managers

And now, once again, the solution being proposed is to cut more eyes from the games.

We've witnessed firsthand what happens when oversight is weakened. Consider the 2022 case involving a dealer at Macau Casino Tukwila. In just five days, she and an accomplice stole over \$180,000 by improperly paying out losing baccarat bets—all without a supervisor present. And yet, rather than invest in proper training and enforcement, the response is to remove even more surveillance.

This isn't just inefficient—it's reckless.

In the End

This kind of quiet unfairness doesn't scream—it settles in slowly. It dulls sharp instincts, erodes trust, and reduces meaningful work to empty gestures. Professionals become placeholders, and the purpose of the role is lost

