



NATIONAL INDIAN GAMING COMMISSION



Annual Report 2004

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INTRODUCTION TO TRIBAL GAMING

BACKGROUND

The rise of tribal government-sponsored gaming dates back to the late 1970's when a number of tribes established bingo operations as a means of raising revenues to fund tribal government operations. At around the same time, a number of state governments were also exploring the potential for increasing state revenues through state-sponsored gaming. By the mid-1980's, a number of states had authorized charitable gaming, and some were sponsoring state-operated lotteries.

Although government-sponsored gaming was an issue of mutual interest, tribal and state governments soon found themselves at odds over Indian gaming. The debate centered on the issue of whether tribal governments possess the authority to conduct gaming independent of state regulation. Although many lower courts affirmed the tribal view in the early cases, the matter was not finally resolved until 1987 when the U.S. Supreme Court affirmed the authority of tribal governments to establish gaming operations independent of state regulation provided that the state in question permits some form of gaming. *California v. Cabazon Band of Mission Indians*, 480 U.S. 202 (1987).

THE INDIAN GAMING REGULATORY ACT OF 1988

Congress took up the issue of tribal gaming and conducted a series of hearings, ultimately culminating in the passage of the Indian Gaming Regulatory Act of 1988 (IGRA). Embodied in IGRA was a compromise between state and tribal interests. The states were given a role in determining the scope and extent of tribal gaming by requiring tribal-state compacts for Class III gaming. However, tribal regulatory authority over Class II gaming without state intervention was preserved in full.

IGRA establishes the jurisdictional framework that presently governs Indian gaming. IGRA establishes three classes of games with a different regulatory scheme for each. Class I gaming is defined as traditional Indian gaming and social gaming for minimal prizes. Regulatory authority over Class I gaming is vested exclusively in tribal governments.

Class II gaming is defined as the game of chance commonly known as bingo (whether or not electronic, computer, or other technological aids are used in connection therewith) and, if played in the same location as bingo, pull-tabs, punchboards, tip jars, instant bingo and other games similar to bingo. Class II gaming also includes non-banked card games, that is, games that are played exclusively against other players rather than against the house or a player acting as a bank. IGRA specifically excludes slot machines or electronic facsimiles of any game of chance from the definition of Class II games. Tribes retain their authority to conduct, license and regulate Class II gaming so long as the state in which the tribe is located permits such gaming for any purpose and the tribal government adopts a gaming ordinance approved by the National Indian Gaming Commission (NIGC). Tribal governments are responsible for regulating Class II gaming with Commission oversight.

Class III is defined as all forms of gaming that are neither Class I nor II. Games commonly played in casinos, such as slot machines, black jack, craps, and roulette fall in the Class III category, as well as wagering games and electronic facsimiles of any game of chance. Generally, Class III gaming is often referred to as full-scale casino-style gaming. As a compromise among Tribal, State and Federal interests, IGRA restricts tribal authority to conduct Class III gaming. Before a tribe may lawfully conduct Class III gaming, the following conditions must be met: (1) the particular form of Class III gaming that the tribe wants to conduct must be permitted in the state in which the tribe is located; (2) the tribe and the state must have negotiated a compact that has been approved by the Secretary of the Interior, or the Secretary must have approved regulatory procedures; and (3) the tribe must have adopted a tribal gaming ordinance that has been approved by the Chairman of the Commission.

The regulatory scheme for Class III gaming is more complex than a casual reading of the statute might suggest. Although Congress clearly intended states to address their regulatory issues in tribal-state compacts, it was not mandatory in IGRA and many states, accordingly, rely upon continued federal regulatory oversight by the NIGC, to address their and Congress's regulatory concerns regarding Class III tribal gaming under IGRA, including approval of management

contracts and tribal ordinances. Thus, the extent of the state's past participation in the regulation of Class III gaming varies from state to state. In addition, IGRA expressly assigned a number of specific regulatory functions to the NIGC. Congress also vested the Commission with broad authority to issue regulations to implement the purpose of IGRA. Accordingly, the Commission plays a key role in the oversight and regulation of both Class II and III gaming.

INTRODUCTION TO TRIBAL GAMING

THE NATIONAL INDIAN GAMING COMMISSION

The Commission was established as an independent federal regulatory agency of the United States pursuant to IGRA. The Commission is comprised of a Chairman and two commissioners, each of whom serves on a full-time basis for a three-year term. The Chairman is appointed by the President and must be confirmed by the Senate. The Secretary of the Interior appoints the other two commissioners. Under IGRA, at least two of the three commissioners must be enrolled members of a federally recognized Indian tribe, and no more than two members may be of the same political party.

The Commission maintains its headquarters in Washington, D.C., with six regional offices located in Portland, Oregon; Sacramento, California; Phoenix, Arizona; St. Paul, Minnesota; Tulsa, Oklahoma; and Washington, D.C. In addition, satellite offices are located in Rapid City, South Dakota; Temecula, California; Bellingham, Washington; and Jackson, Mississippi.

MISSION STATEMENT

It is the mission of the Commission to fulfill the mandates of IGRA in fostering economic development of Indian tribes by ensuring the integrity of Indian tribal government gaming on Indian lands and that tribes are the primary beneficiaries. This is accomplished by the promulgation of regulations to guide the operation of tribal government gaming; by direct regulation of certain aspects of such gaming activities, and coordinated regulation with tribal and other regulatory agencies through review and approval of tribal gaming ordinances and agreements; by reviewing backgrounds of individuals and entities to insure the suitability of those seeking to engage or invest in such gaming; by maintaining oversight and review of the actual conduct of such gaming and the financial performance of such gaming; and by bringing enforcement actions for violations of IGRA, the regulations of the Commission, and tribal gaming ordinances, including imposing appropriate sanctions on those committing such violations. As it fulfills these responsibilities, the Commission is particularly vigilant

for any indications of corrupting influences such as those posed by organized criminal elements known to be attracted to cash-intensive industries such as gaming.

The Commission is mindful of the trust relationship the United States bears to the Indian nations it serves and of the importance of prompt and efficient administration of IGRA to foster the economic development so urgently needed by Indian tribes. In all phases of its regulatory performance, the Commission and its staff observe due process rights of those who come before it and extend all individuals the courtesy they are entitled to expect from their government.

The Commission strives to be responsive to tribes seeking guidance as they enter the dynamic gaming industry, monitors trends in tribal government gaming and reports its findings to Congress and the Administration.

THE COMMISSION



Chairman Philip N. Hogen is an enrolled member of the Oglala Sioux Tribe of the Pine Ridge Indian Reservation in South Dakota. Mr. Hogen was formerly Associate Solicitor for the Division of Indian Affairs, U.S. Department of the Interior. Mr. Hogen joined the Department in 2001 after practicing Indian law in Rapid City, South Dakota, where he was affiliated with the national law firm of Holland & Knight LLP. Mr. Hogen also served as an Associate Member and the Vice Chairman of the National Indian Gaming Commission from 1995-1999, and was the first Director of the Department of Interior Office of American Indian Trust. Mr. Hogen was United States Attorney for the District of South Dakota, serving in that position for more than ten years. Mr. Hogen earned his law degree at the University of South Dakota (1970) and his undergraduate degree at Augustana College in Sioux Falls, South Dakota (1967). He was appointed NIGC Chairman in December of 2002.



Vice Chairman Nelson W. Westrin served as the first Executive Director of the Michigan Gaming Control Board from 1996 until 2002, with responsibility for every facet of the state agency. He worked closely with tribal officials while carrying out the state's oversight of the Native American casino gaming operations in Michigan. Mr. Westrin was an Assistant Attorney General for the State of Michigan from 1977 to 1993; and from 1984 to 1993, he was assigned to the Lottery and Racing Division. Mr. Westrin served as the Assistant Prosecuting Attorney for Ingham County, Michigan. Mr. Westrin received his Bachelor of Arts degree from Michigan State University in 1969. He holds a Juris Doctor from the Detroit College of Law, which he was awarded in 1974. He was appointed Vice Chairman of the NIGC in December of 2002.

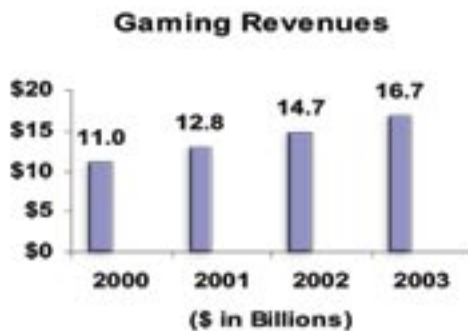


Commissioner Cloyce V. Choney is a member of the Comanche Nation of Oklahoma. From 1976 to 2001, Mr. Choney served as a Special Agent for the Federal Bureau of Investigation. During that time, he handled a variety of cases and investigations and was awarded several Federal Bureau of Investigation commendations. He also served as Chair of the Native American/Alaska People Advisory Committee. In 2002, Mr. Choney became the Chief Executive Officer for Indian Territory Investigations. In that capacity, Mr. Choney was responsible for business development and the reporting and supervision of day-to-day activities related to the company's function of pre-employment background investigations. Between 1969 and 1975, Mr. Choney served in the United States Army, where he earned the rank of Captain. Mr. Choney has been a member of the National Native American Law Enforcement Association, and he served as its president from 1996-1997. He received a Bachelor of Science in Military Science from Oklahoma State University in 1968. He was appointed to the NIGC in December of 2002.

MESSAGE FROM THE CHAIRMAN

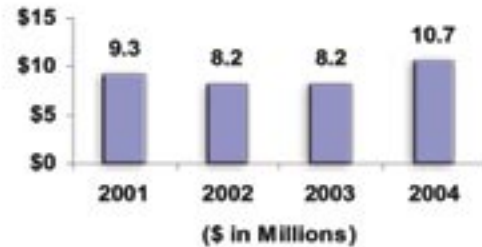
2004 was a year in which the National Indian Gaming Commission moved forward to address several of the major concerns identified in its outreach in consultation efforts during 2003. Major initiatives of the Commission included launching a comprehensive review of the Commission's Minimum Internal Control Standards (MICS), as well as mobilizing an effort to more clearly distinguish between electronic and technologic aids which are permitted to aid in the play of uncompact Class II gaming, and electronic facsimiles and slot machines which require Class III compacts to be utilized in tribal gaming. The consultation process the Commission embarked upon in 2003 continued throughout 2004, and these issues evolved as those with great importance to the tribal gaming industry.

Since the outset, this Commission pledged that continuous consultations will be scheduled to ensure that all tribes have the opportunity to present their respective positions on various issues. In 2004, the Commission engaged in seven different government-to-government consultation meetings in various locations throughout the country. The Commission invited 72 tribes, of which 59 tribes attended. We feel that the Commission and the respective tribes have a greater understanding of how NIGC is addressing the complicated issues facing the Indian gaming industry as a result of this government-to-government consultation.



Revenues at Indian casinos, which are reported on a one-year lag basis, grew in the latest reporting period by more than 13% or \$2.0 billion in 2003. Currently, some 224 tribes operate over 400 gaming facilities in 28 states. We expect continued growth in areas such as Oklahoma where several casinos are in the expansion, construction or discussion stages as a result of tribes' ability to compact with the state for Class III gaming.

GROSS EXPENSES



Funding has been an issue since the Commission was established in 1991. The Commission is unique in that it is a federal agency now funded solely by the industry it regulates. To be effective, the Commission must be knowledgeable of the regulatory framework of over 200 gaming tribes throughout the country with very diverse gaming structures, and have an understanding of the interaction between tribal and state gaming authorities.

Congress approved an increase in the Commission's funding from \$8 million to \$12 million for fiscal years 2004 and 2005, the first increase in funding since 1998. For the period through 2003, the Indian gaming industry was expanding significantly while NIGC's resources were not. Legislation enacted in 2003 increased the maximum amount the Commission could assess on gross tribal gaming revenues from \$8 million to \$12 million. This permitted the Commission to gradually back fill and expand its regulatory resources, expending \$10.7 million in 2004 for the operation of the Commission, well under the \$12 million it was authorized to collect. This funding for the Commission's operation was generated by the assessment of a fee of .063% on gross tribal gaming revenues in excess of \$1.5 million per operation.

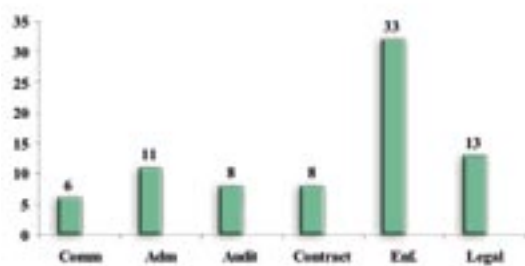
It appears that Indian gaming will continue to experience steady growth in 2005, and the Commission projects that due to this growth, the preliminary rate of the fees for 2005 will be .059%, or 59 cents of every \$1000 of gross tribal gaming revenues. The total collected would still be within the \$12 million the Commission is authorized.

MESSAGE FROM THE CHAIRMAN (CONTINUED)

While the funding is small in comparison to the Nevada or New Jersey State regulatory agencies, it is important to keep in mind IGRA recognizes the tribes as having sovereign authority and responsibility with respect to the day-to-day operation and regulation of gaming on their tribal lands and they are the primary regulators.

Staffing remained consistent through the year. The Commission filled a number of vacant positions in both the Washington and regional offices. As the detailed budget shows, salaries and benefits represented 66% of total 2004 gross expenditures. Staff additions in the future will be directed toward field operations.

STAFFING BY DIVISION



Consultations are an important and effective method of communicating with the federally recognized tribes and their authorized government leaders. The NIGC published in March 2004 an official government-to-government consultation policy, which states that consultation, among other things, means the Commission will engage in regular, timely and meaningful government-to-government dialogue on matters impacting Indian gaming. In addition to the consultations that were held across the United States, the Commission and staff participated throughout the year in seminars, roundtables and association meetings covering all aspects of Indian gaming.

Gaming Classification, or the distinction between Class II and Class III gaming, was one of the most important issues dealt with during the year. The issue is important primarily because Class III gaming requires a tribal state compact, while Class II gaming does not.

Twenty-two of the twenty-eight states with Indian gaming activities have Class III gaming. The extent of the states' involvement in the regulation of Class III gaming varies considerably from state to state. The Class II Game Classification Advisory Committee assisted the Commission in making advances in the development of classification and technical standards for Class II games. The classification standards will clarify the distinction between Class II and III games played through electronic medium, while the technical standards will establish minimum standards for the operation of the technical aids that support such Class II games. The Commission plans to complete promulgation of Class II classification and technical standards in 2005, after consultation with all affected tribes.

Training is an important part of the Commission's role in gaming since well-trained tribal gaming officials will better protect the integrity of gaming and assists us in our efforts. In addition to the general presentations made during the year, the Commission provided specific training to tribal leaders and gaming officials in all aspects of gaming regulation. Minimum Internal Control Standards (MICS), environment, public health and safety, tribal gaming authority responsibilities and land issues were the subjects of over twenty training sessions sponsored during the year.

Enforcement actions are one of the least desirable but necessary parts of the Commission's oversight responsibilities. In spite of the intentions, experience and training of the tribes, there are times when enforcement action is required. During the year, the Commission issued four Notices of Violation. In most cases, the Commission prefers to resolve potential violations by issuing a warning notice, giving a tribe an opportunity to correct the practice in question since this will ultimately result in improved gaming practices.

Information System upgrades and modifications continued to be designated as a priority in 2004. New systems are in place to speed up the processing of information to tribal gaming officials.

While significant progress was made during the year, the Commission has an aggressive plan for 2005. Objectives for the new year can be broken down into three primary areas:

MESSAGE FROM THE CHAIRMAN (CONTINUED)

- *Continue Government-to-Government Consultations.* The Commission takes very seriously its commitment to consult on a government-to-government basis with tribal leadership, as evidenced by its adoption of its formal consultation policy in early 2004, and its implementation of that policy by way of meetings with tribal leadership on reservations, in NIGC's National and Regional offices, and by traveling to all areas served by the Commission. A further manifestation of the Commission's commitment to consultation was the formation and utilization of tribal advisory committees in the development of amendments to the Minimum Internal Control Standards and the drafting of Class II Classification and Technical Standards. Those tribal advisory committees were selected from tribal gaming experts nominated by tribal governments.
- *Adapt to Changing Gaming Technology and Methods.* Regulatory changes are required as gaming technology and practices change. To address this important need, the Commission recently contracted with technical experts and established a tribal advisory committee to assist the Commission in developing and implementing necessary and appropriate classification and technical standards to distinguish Class II and Class III gaming and related electronic, computer and technologic devices and regulate their operation in Indian gaming under IGRA. In addition, the Commission has also established a standing tribal advisory committee to help the Commission keep its Minimum Internal Control Standards (MICS) effective and current. The Commission expects to

finalize promulgation of the necessary Class II standards regulations and MICS revisions in 2005, after completing consultations with all affected tribes.

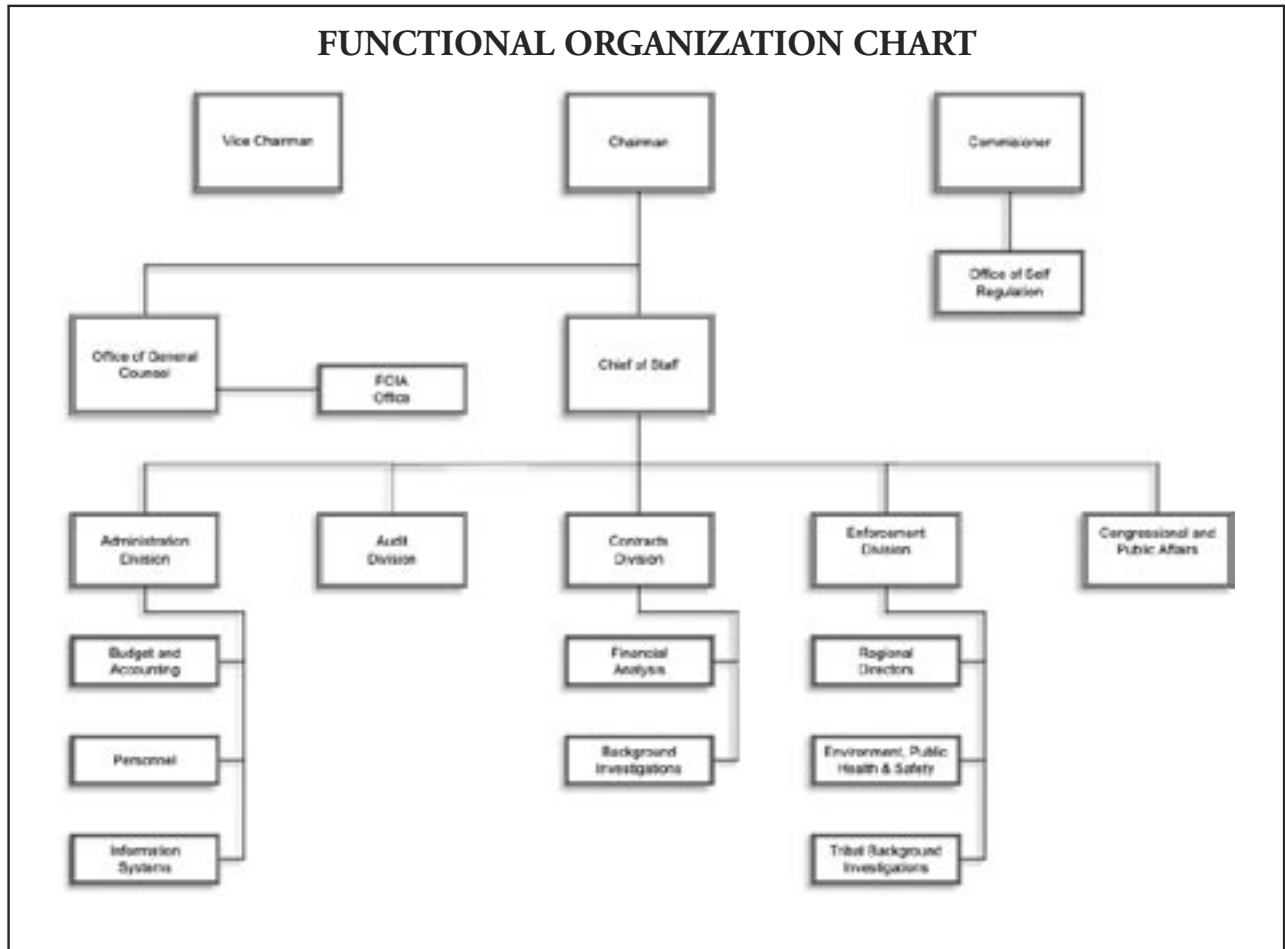
- *Improve Oversight and Enforcement Effectiveness.* This will be accomplished by cross training of the Audits/ Enforcement, and Contract personnel. The number of comprehensive MICS audits and special MICS specific reviews will be increased. Better utilization of data base information and continued cooperation with other regulatory and law enforcement agencies will increase the effectiveness of the Commission.

More than two years have quickly passed since the current Commission took office. Much has been done and much remains to be done. Indian tribes invented tribal gaming and the NIGC needs to regularly remind itself that Indian gaming is not a government program, but rather an entrepreneurial endeavor tribes have very successfully utilized to achieve economic development. NIGC must find ways to cultivate, not impede that economic development, so that tribes can meet the many needs on their reservations and of their membership. The primary method to continue tribal government in sponsoring gaming as an economic tool is by insuring that there is integrity in the operation and regulation of Indian gaming at all levels, and to vigilantly monitor its cooperation and interface with tribal regulators, and to avoid unneeded duplication and maximize efficiencies and cooperation.



Philip N. Hogen
Chairman
March, 2005

STRUCTURE AND OPERATIONS



ADMINISTRATION

The Administration Division serves the financial, personnel, office services and information needs of the Commission. Included in the four categories are fee processing and collection as well as procurement. The Administration Division is the liaison to the Department of the Interior (DOI), Office of Management and Budget (OMB), and General Services Administration (GSA). The Administration Division consists of a Director, three supervisory personnel, and a seven-person support staff. A portion of the personnel activities are contracted to Minerals Management Service (MMS) at DOI and a portion of the accounting activities are contracted to the National Business Center (NBC).

The Administration Division initiated five major projects in 2004, all scheduled for completion in 2005. These include:

- *Database.* Information system upgrades and modifications were designated as a priority in 2004. An independent study was conducted to assess the agency's current information management, and develop a desired model for capturing and sharing information. The completed study has been reviewed and the selection process is underway to identify a vendor to build the new system. The new system will serve not only the agency's needs but will have the capability of providing relevant information to gaming tribes.

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- *Information System Review.* Projects to update and upgrade the Commission's computer systems began in 2004. Independent studies were conducted to review the information system needs of the organization consistent with Commission objectives. Recommended changes will be put in place in 2005. The focus of these changes will be on the database design and administration, hardware and software needs and information security.
 - *Live Scan Fingerprint Program.* An electronic system for processing fingerprints through the Federal Bureau of Investigation (FBI) has been fully implemented in 2004. Tribes can purchase and use fingerprint scanning equipment in conducting background investigations for gaming license applicants. Tribes' fingerprint equipment can then connect to NIGC to receive FBI fingerprint database search results. This process makes Criminal History Reports (CHRI) available to tribes within 24 hours of submitting electronic fingerprints to NIGC, compared to the manual system that could take several weeks. The system is now available to all gaming tribes.
 - *Paper Check Conversion Project.* The Commission collects fees from the gaming tribes based on gross gaming revenues. The paper check conversion project, which is sponsored by the U.S. Department of the Treasury Financial Management Service, will allow the Commission to improve its cash management and also streamline the documentation and recording of amounts collected. NIGC will implement this program when Treasury has completed the version that is compatible with NIGC's requirements. The Financial Management Service projects completion by mid summer of this year.

AUDITS

The Audit Division began 2004 with four compliance audits performed. During the year, one of the carryover assignments was successfully completed via the resolution of the compliance exceptions by casino management; one became a criminal referral to the Federal Bureau of Investigations; one became the subject of litigation but was later successfully performed and exceptions remedied; and

one continues to be pending but successful resolution of the audit findings is anticipated.

During the year, Division personnel performed eleven comprehensive MICS compliance audits, of which one was finalized by year end. Gaming activities have been suspended by one tribal government and four other audits appear to be unlikely to achieve resolution of the audit exceptions short of an enforcement action. Of these four properties, one has also become a criminal referral and another has resulted in the discovery of other regulatory violations. The Division is working with the remaining five auditees in the identification and implementation of corrective actions. Successful resolution of the audit exceptions is anticipated.

History supports the proposition that gaming is exceedingly vulnerable to compromise and that corrupting influences can originate with employees, patrons or vendors. Furthermore, gaming regulators have long recognized that two proactive processes are essential to the deterrence of corruption. First, there must be an effective process by which the suitability of individuals is examined to determine appropriateness to be employed in an industry as highly regulated as gaming and, second, there must be codified rules stipulating exacting internal controls to ensure gaming transactions are appropriately authorized, documented and monitored. It is this latter process that dominates the workflows of the Audit Division.

On February 4, 1999, the Commission enacted Part 542 Minimum Internal Control Standards (MICS), which possessed the overall objective of codifying specific controls essential to governing gaming and gaming-related transactions and events. The regulation recognizes tribal gaming regulatory authorities as having primary responsibility for the oversight function and establishes a minimal baseline upon which tribal regulators are expected to create an effective set of gaming regulations. However, for the MICS to accomplish its objectives, the Commission deemed it necessary to create a process whereby tribal gaming operations are monitored to verify compliance with the federal rule. Specifically, the Audit Division is charged with the responsibility of conducting comprehensive compliance audits, which are intended to identify incidences of noncompliance. Furthermore, the Division is tasked with follow-up procedures to ensure the remedial action plans of

the gaming enterprises rectify internal control deficiencies (MICS exceptions).

Recognizing that tribal gaming regulatory authorities are responsible for the oversight of their respective gaming operations, the Audit Division does not perform routine compliance audits such as those performed by state gaming jurisdictions. The Division reviews financial and regulatory data, along with information obtained from the Commission's Enforcement Division, and a risk assessment is performed. The Division's analysis is intended to predict the likelihood of noncompliance with the MICS.

Additionally, the Division occasionally performs specialty audits, which are varied in nature and scope. Often involving allegations of criminal activity, the inquiries can be complex and require a high level of technical gaming knowledge. Generally, an investigative team will involve personnel from the Audits and Enforcement Divisions.

From an organizational perspective, 2004 has been a year of transition for the Audit Division. The number of auditors increased from seven to eleven. Additionally, satellite offices were staffed in Temecula, California, and Jackson, Mississippi. Consistent with the Commission's recognition that Field Auditors be well experienced in gaming, auditors possess an accounting degree and a minimum of three years casino auditing experience, or the equivalent.

Because stimulating economic development is a primary goal of IGRA, the Audit Division has expended considerable resources in developing automated audit programs to measure compliance with the MICS. The sampling criteria and testing checklists provide reasonable assurance that incidences of non-compliances are detected.

The Audit Division directly regulates certain aspects of the gaming activities relevant to the MICS, and coordinates such regulation with tribal and other regulatory agencies. The Audit Division conducts comprehensive MICS compliance audits of tribal gaming operations. The period subject to audit is the previous twelve months and, in addition to real-time testing, one test date per quarter is selected as a sample in which all records pertaining to the requirements of the MICS are examined. After submitting a report of findings

to the tribal government, the Division assists management of the gaming enterprise in the identification and implementation of remedial actions to rectify compliance exceptions. Frequent interaction with the tribal gaming regulatory authority is common.

As part of its financial role, the Audit Division analyzes the audited financial statements and internal control system evaluations that are required to be filed with the Commission 120 days after fiscal year end. The data, along with information originating from a variety of sources, is scrutinized to identify risk factors reflecting upon the probability of noncompliance with the MICS. The gaming operations deemed to possess a high risk are considered for a comprehensive MICS compliance audit. The size of the a gaming operation, geographical location, effectiveness of the tribal gaming oversight function, management competency and internal resources of the Commission are also considered. The Audit Division is also well aware that its contribution to the Commission's Mission Statement is contingent upon its ability to effectively communicate to gaming regulators and operators the worthiness of employing effective internal control systems. Therefore, the Division invests significant resources in training on the best practices of the gaming industry and other opportunities to render instruction on the MICS.

Another major concern of the Division is detecting violations of IGRA, the regulations of the Commission, and instances relating to tribal government gaming which threaten the safety of the tribes, their assets, those engaged in the industry, and the public upon which the industry depends. To facilitate the imposition of appropriate sanctions on those committing violations of the statute and accompanying regulations, the Division works closely with the Commission's Enforcement Division and Office of General Counsel in the justification of punitive actions, when such responses are deemed necessary. Furthermore, personnel frequently interact with other regulatory and law enforcement agencies as warranted in the prosecution of offenses occurring on Indian lands.

Personnel also participate in a federal working group that shares information relevant to significant criminal activity occurring in Indian gaming. Recognizing the particular

expertise of Division personnel, requests for assistance in the investigation of irregularities from other regulatory and law enforcement authorities has not been uncommon. Additionally, Field Auditors are well informed regarding the typical methodologies employed by criminal elements attempting to exert control over a gaming operation. Referrals to various law enforcement authorities have occurred and have resulted in successful investigations of organized criminal syndicates involved in Indian gaming.

For 2005, the Audit Division has identified the following strategies to accomplish its goals and objectives:

- *Compliance Audits.* The Division will strive to conduct a total of fifteen comprehensive MICS compliance audits in which at least \$1.5 billion in gross gaming revenue will be subjected to examination.
- *MICS Advisory Committee.* The Division will continue to assist the Committee in the identification and promulgation of amendments to the MICS to ensure the regulation's effectiveness. The ultimate objective shall be to adopt such revisions as necessary to ensure congruity with applicable regulations of the established gaming jurisdictions.
- *Compliance Risk Analysis.* The Division will facilitate the development of Auditor expertise in the evaluation of financial and other data to detect risk factors reflecting upon a tribal gaming operation's likelihood of noncompliance with the MICS.

CONTRACTS

The Contracts Division is responsible for reviewing all gaming management contracts and modifications to gaming management contracts between tribes and management contractors. Upon completion of a management contract review, the Contracts Division forwards a recommended action to the Chairman, who must approve the contract before it can become effective. This review and approval process is mandated by IGRA as a means of shielding Indian gaming from organized crime

and other corrupting influences and to ensure that the Indian tribe is the primary beneficiary of gaming revenue.

The staff of the Contracts Division consists of a Director, one full-time and one part-time financial analyst, a database specialist, a chief of management contract background investigations, and two full-time and one part-time financial background investigators.

During the management contract approval process, the Contracts Division staff works closely with all interested parties, including tribal officials, management contractors attorneys, accountants, and tribal gaming commissioners, to ensure that all essential information is submitted. To recommend approval, the staff must be satisfied that contracts meet all the requirements established by Congress in IGRA and that collateral agreements do not violate federal law. Additionally, required investigations of persons and entities with a financial interest in, or management responsibility for the contract must be satisfactorily completed and the related suitability criteria met. And, finally, the Commission must be in compliance with National Environmental Protection Agency.

Two hundred thirteen (213) management contracts have been submitted for review and approval in the twelve years since the Commission became operational in early 1993. Forty-four contracts have been approved, and twenty-three contracts were in process as of December 31, 2004. One hundred and forty-six contracts have been withdrawn, disapproved or closed for other reasons. In addition, several previously approved management contracts have been modified one or more times, each modification requiring the staff's review and the Chairman's approval.

The Contracts Division also receives and tracks the annual audit reports submitted by all gaming operations, determines compliance and extracts key financial information from each report. Such information is, among other things, used to report annually the size of the Indian gaming industry to assist the Audits and Enforcement Divisions in their oversight functions. The Contracts Division also refers non-compliance issues to the Enforcement Division and/or the Office of General Counsel for further action.

Objectives for 2005 include:

- *Process Review.* Continue to review the process and procedures relating to the review and approval of management contracts for the operation of tribal gaming facilities to determine if changes can be made that will assist tribes in efficiently completing the process while continuing to ensure compliance with standards specified in IGRA.
- *Database Development.* Assist in the development and maintenance of a Commission financial database of tribal gaming operations and make relevant information available to the Enforcement and Audit Divisions to assist in their oversight role.
- *Commission National Environmental Policy Act Role.* Review the environmental discipline needs of the Management Contract Division and make recommendations on how best to meet the objectives of NEPA.
- *Cross-training.* Provide cross-training and assistance to the auditors and investigators in the Audit and Enforcement Divisions as the opportunities and needs arise.

ENFORCEMENT

Field investigators conducted 568 site visits to tribal gaming operations during the calendar year 2004. The Enforcement Division issued 57 potential notices of violation (warning notices) and provided evidence leading to the issuance of four notices of violation.

The Enforcement Division continued to play a critical role in processing background investigations of employees at tribal gaming facilities. IGRA requires that Indian tribes conduct background investigations on their key employees and primary management officials and notify the Commission of the results of the background investigations before issuing

a license to those individuals. In 2004 the Enforcement Division received and processed 31,480 investigative reports and 49,928 fingerprint cards submitted by tribes in compliance with this obligation.

Last year the Enforcement Division also made significant progress in implementing an electronic system for processing fingerprints through the Federal Bureau of Investigation (FBI). Tribes taking advantage of this new technology receive CHRI reports within 24 hours after submitting the electronic fingerprints to the NIGC. The NIGC completed its testing of the viability of the electronic fingerprint system and is now offering access to the electronic fingerprint processing system to all interested gaming tribes. In 2004, 71 tribes began utilizing this technology. In addition, a significant number of tribes have notified the NIGC of their intent to use the technology.

In 2004 the Enforcement Division completed the implementation of its Environmental, Public Health and Safety oversight program. The primary role of the Enforcement Division in this area is to review tribal gaming operations to ensure that tribal standards are in place. The Division also provides assistance to tribes in locating relevant expertise from other governmental agencies. In 2004, the Enforcement Division conducted a series of training sessions to inform tribes about the Environment, Public Health and Safety program. In addition the Enforcement Division completed a review of the compliance status of 90 tribal gaming operations.

In 1997 the NIGC began publishing a compliance report that reflects the compliance record of all gaming tribes with regard to eight critical regulatory requirements set forth in NIGC regulations. This report is published every six months and has helped improve the efforts of tribal governments to meet their compliance responsibilities. Last year the Compliance Report was amended to include compliance with the Minimum Internal Control Standards (MICS) in addition to the eight critical areas previously covered. The Compliance Report has been a useful tool in aiding the Commission's efforts to increase voluntary compliance with its regulations. The report also helps the Enforcement Division design more relevant training programs.

In the past year, the Enforcement Division has expanded its training activities for tribal gaming regulators. The Division now attempts to offer at least one training conference a month in each regional office. These sessions cover a wide range of compliance and law enforcement issues.

In 2004, the Enforcement Division opened satellite offices in Jackson, Mississippi, and Bellingham, Washington. Such offices are expected to both improve the Division's oversight efforts and reduce travel costs.

During the last year the Enforcement Division was an active participant in the Federal Indian Gaming Working Group. This group was formed to coordinate the investigative efforts of federal agencies with oversight authority in Indian gaming. The Enforcement Division participated in a number of working group conferences and is actively involved in ongoing investigative activities of the working group.

The top priority of the Enforcement Division in 2004 was to ensure tribal compliance with the fundamental statutory and regulatory compliance obligations required by IGRA. The Division's oversight activities primarily involved the performance of six critical functions. These included:

- *Monitoring* Indian gaming operations for compliance with NIGC regulations. Such monitoring activities range from reviews of gaming operation books and records to on-site inspection of steps taken by a gaming operation to ensure the health and safety of the public.
- *Assisting tribes* in developing a regulatory structure to comply with IGRA and NIGC requirements. This includes offering advice on how best to structure a tribal gaming commission and reviewing operating procedures with tribal gaming commissions and gaming operation managers.
- *Investigating* matters relating to regulatory violations and alleged criminal activities. These investigations result in the issuance of Notices of Violation, Closure Orders, and Civil Fine Assessments by the NIGC and the initiation of criminal investigations by various laws enforcement authorities.

- *Functioning as liaison* to federal, state, and tribal law enforcement officials. Field investigators facilitate the flow of information between various regulatory authorities, and help coordinate investigative and monitoring activities related to Indian gaming operations, individuals and companies employed by Indian gaming operations.
- *Mediating disputes* that threaten the integrity of the tribal gaming operations. These disputes involve factional divisions within tribes as well as disputes between tribes and management contractors.
- *Conducting background investigations* of individuals and companies seeking approval of management contracts. The field investigators review pertinent documents and records, conducts interviews and verify the accuracy of information submitted by applicants.

OFFICE OF GENERAL COUNSEL

The Office of General Counsel serves as the legal staff of the Commission. It represents the Chairman and Commission in formal enforcement actions, coordinates litigation with the Department of Justice, reviews tribal ordinances and contracts and provides legal advice on a wide variety of issues.

The current staff consists of the Deputy General Counsel, who also serves as the Acting General Counsel, the senior attorney, eight staff attorneys, a Freedom of Information Act (FOIA) officer and three legal staff assistants. One attorney was added to bring special expertise to the development of technical standards.

Commission priorities in 2004 required that the General Counsel staff dedicate much of its efforts to drafting and assisting the Commission in the development of the classification standards regulations, the technical regulations and several updates to the minimum internal control standards (MICS).

Historically, one of the most difficult legal challenges facing the Commission is the classification of games as Class II

or III. To provide guidance to the regulated community, the Office of General Counsel issues advisory opinions on classifying games. With the development of guidance through advisory opinions and drafting of the classification regulations, the industry was provided with guideposts for the development of Class II electronic bingo. With this guidance, manufacturers are developing new games and gaming operations that were previously offering Class III gaming without a compact are continuing to move toward Class II compliance.

The Office of General Counsel also provides advice on difficult Indian lands questions. Indian tribes may conduct gaming only on Indian lands. For purposes of reviewing management contracts, approving site-specific tribal ordinances, or merely deciding whether the Commission has the authority to regulate the gaming on a particular tract of land, the Office of General Counsel provides advisory opinions on the status of the lands. In one difficult case, the Wyandotte Nation of Oklahoma opened a gaming facility in the State of Kansas. This resulted in litigation involving the State, the Nation and the Commission. The Nation subsequently submitted a site-specific amendment to its tribal ordinance which was ultimately disapproved by the Commission on the theory that the Kansas tract was not lands on which the Nation could conduct gaming. This decision was appealed to the federal district court and litigation is pending.

When the Chairman determines that formal enforcement actions must be pursued, the Office of General Counsel serves as the Commission's prosecutorial arm. An example of significant enforcement actions brought by the Office in 2004 included the closure of the casino owned and operated by the Coyote Valley Band of Pomo Indians which was operating Class III games without a Tribal-State Compact. The Band's gaming operation closed briefly but the federal district court enjoined the Commission from enforcing its order so long as the Band moved quickly to compact with the State of California. Although the litigation is still pending, the Band is now providing Class III games under an approved compact.

An enforcement action, initiated in 2001, was challenged by the Colorado River Indian Tribes on the theory that the

Commission did not have the authority to demand access to Class III operations or to issue regulations establishing MICS for Class III operations. The Commission's 2002 decision affirmed the regulatory scheme that encompassed Class III operations. Subsequently, on July 17, 2003, the Commission found that the tribes denied Commission representatives access to the Class III gaming operation. The tribes were fined for this violation. While the tribes acceded to the Commission by permitting an audit of their internal controls, they filed suit in federal district court to obtain judicial review of the Commission's decision. The parties have now briefed all of the issues and a decision on the Commission's authority over Class III operations, as it pertains to the MICS, is expected in 2005.

Two areas where the Office of General Counsel routinely responds to a number of requests are tribal ordinances and contracts. Fifty-one tribal ordinances were submitted for review and approval in 2004. In addition to providing legal advice on management contracts, the Office of General Counsel reviews other contracts to determine whether they are management contracts and therefore subject to IGRA's approval requirements. Thirty-four of these contracts were submitted in 2004. Several raised the difficult question of whether the contractor's interest in the tribe's gaming operation is proprietary in violation of IGRA.

The Office of General Counsel also processes requests filed under the Freedom of Information Act (FOIA). During the course of the last fiscal year, 104 requests for information were received and 150 requests were processed, including carryover from the previous year.

Other important actions included the land opinions for the Karuk Band and Shingle Springs Rancheria, participation on the FBI Working Group, the dismissal of NEPA litigation, advice to the field offices and MICS variance requests, and assistance to the Department of the Interior as it has developed Secretarial procedures in lieu of compacts and draft allocation plan regulations.

Objectives, Strategies and Challenges in 2005 include:

- *Regulatory.* Provide the staffing for final publication of the regulations on classification standards, technical standards

and three, possibly four, new revisions to the MICS. Litigation is likely on the classification regulations as several tribes have commented that they do not support some of the positions taken in the draft classification standards regulations.

- *Game Classification.* Provide more advice on games that are not covered by the new regulations, primarily card games. The office will also assist in training on and explaining the new regulations. If the classification regulations are struck down by a federal court, the Office will not likely have the opportunity to focus on other games.
- *Guidance to Tribes.* Provide guidance as required and specifically draft guidance on issues that include use of revenues under IGRA, the tribe's sole proprietary interest in the gaming operations and a model gaming ordinance. Whether a tribe retains its sole proprietary interest in gaming is often dependent on the facts and circumstances of the specific situation. Consequently, providing general guidance and bright lines to address this issue will prove difficult. Much of the guidance will be formulated after specific consultations with tribes. Such consultation is usually initiated through letter requests and regional consultation meetings with individual tribes. The Office of General Counsel attends these meetings along with the Commissioners.
- *Indian Lands Questions.* Provide guidance on several difficult pending Indian lands questions. The Department of the Interior has an interest in decisions impacting tribal jurisdiction. Therefore, the Office of General Counsel attempts to coordinate a joint federal government response. Because the interests of the two agencies sometimes differ, developing guidance to which both agencies can agree has proven difficult.
- *Information Availability.* Make more information available to the public. This will be accomplished by placing all of the tribal ordinances and other frequently requested documents on the Commission's website. Because the FOIA Office has become more efficient in processing FOIA requests, the personnel from the FOIA Office will be able to support this effort. Making such information available on the website should also reduce the number of FOIA requests. The

process of updating the computer hardware and software may also slow down implementation of this objective.

- *Formal Enforcement Action.* Issue more formal Notices of Violation on the failure to submit audits, fees, and minimum internal control reports in a timely fashion and failure to conduct and submit background investigations of key employees and primary management officials. The goal of this stepped up approach to these notices of violation is to encourage tribes to treat these IGRA requirements as important steps to gaming regulation.

Accomplishing these objectives will depend on staffing availability and priority. If the level of enforcement actions increase, Commission priorities change, or additional litigation is brought, staff will be diverted accordingly.

The Office of General Counsel will continue to: provide general legal advice; review tribal ordinances and contracts; and review the Indian lands questions as they arise. The classification advisory opinions and enforcement actions for playing Class III games without a compact should become a much less significant part of the Office's workload once the regulations are finalized. However, the technical standards and minimum internal control standards will need to be updated on a regular basis. If the classification or MICS are struck down in federal litigation, the full impact on the Office cannot be estimated at this time.

With the Oklahoma tribes entering into compacts and the possibility of such compacts in the State of Florida, the Office's guidance and enforcement actions will likely become more focused on the needs of individual tribes, which may provide improvement in the regulation of the gaming.

OFFICE OF CONGRESSIONAL AND PUBLIC AFFAIRS

The Office of Congressional and Public Affairs is responsible for planning, coordinating and managing agency programs and activities relating to both legislative and public affairs. Among its principal duties, the Office of Congressional and

Public Affairs monitors legislation affecting the Commission and advises on any necessary policy action. The Office of Congressional and Public Affairs coordinates submission of bills, resolutions, reports, testimony, and other statements on legislation to Congress, and also prepares agency press releases, speeches, reports and policy statements.

In 2003, Congress authorized an increase to the Commission's budgetary fee cap from \$8 million to \$12 million for fiscal years 2004 and 2005. While the authorization is a maximum of \$12 million, actual assessments should be well below this amount.

Although Congress has recognized and responded to the Commission's need to fund essential regulatory activities, the increase in the fee cap on an annual basis has hindered the Commission's ability to develop long-term plans. Further, future fee caps set by Congress may not necessarily reflect the growing size of the Indian gaming industry. In May 2003, the Commission testified before the Senate Committee on Indian Affairs and recommended a formula that would allow the Commission to collect fees based on the size of the industry. The Commission continues to advocate this change.

During the 108th Congress, legislation was introduced that would make technical changes regarding the staffing, clarify the Commission's authority over Class III gaming, direct that MICS be revised and set a schedule of the maximum amount of fees the Commission is authorized to collect. This legislative proposal was not passed into law. The Commission will continue to work with members during the 109th Congress to pass legislation that will modernize the statutory structure under which the Commission operates and provide stability for the Commission's funding.

Improving communications is a priority of the Commission. In 2004, the Commission was featured in a variety of publications including Casino Enterprise Management and Indian Gaming Magazine. These and other articles generally focused on providing information on activities of the Commission, including explaining the role of the Commission, describing the Commission consultation meetings throughout Indian Country, outlining the challenges facing the Commission, and clarifying agency decisions.

Objectives in 2005 include:

- *Communication.* Work to increase communication with members on Capitol Hill and their staff to provide assistance on gaming related matters in Indian Country.
- *Congressional Briefings.* Provide briefings for staff in both the House and Senate regarding the role, responsibilities and activities of the Commission.
- *Public and Media.* Increase communication with the general public and media resources by responding to all inquiries, posting press materials on the Commission website and informing the media in advance about Commission events.
- *Contact Inventory.* Build on the existing list of media and congressional contacts to ensure that individuals with an interest in Indian gaming are provided regular updates on Commission activities.

OFFICE OF SELF-REGULATION

The Office of Self-Regulation's primary responsibility is to process tribal petitions for self-regulation for Class II gaming. Self-Regulation status provides tribal governments with increased regulatory responsibility and greater autonomy by diminishing the role of the Commission in the areas of monitoring, inspection and review of background investigations. Self-Regulation status also results in a reduction of fees paid to the Commission.

To participate in the Self-Regulation program, a tribal government must satisfy a number of requirements. First, it must demonstrate that it has a system for effective and honest accounting of all revenue. It must also show that a system for investigating, licensing and monitoring all employees of the gaming activity is in place. Reviewers must determine whether the tribal government has

established standards and practices to ensure that the facility is operated on a fiscally and economically sound basis. Another key element is compliance with IGRA, Commission regulations and applicable tribal regulations and/or ordinances. Finally, a petitioning tribe must show that its operations have met the minimum requirements for a period of three years.

The final rule regarding the issuance of Certificates of Self-Regulation was issued in August 1998. Two tribes have been issued Certificates of Self-Regulation.

COOPERATION – OTHER REGULATORY AND ENFORCEMENT AGENCIES

The overall effectiveness of the Commission is enhanced because of relationships forged with other agencies and commissions that make determinations on Indian gaming or have a regulatory or statutory role in maintaining the integrity of the industry. The Commission has entered into memoranda of understanding with several agencies and commissions. Some of the memoranda outline services to be provided by other agencies, while others authorize the sharing of investigative information and establish protocols for working together. In addition, there are several agencies where no memorandum of understanding exists, but the subject matter requires or encourages notification of follow-up on issues of mutual interest.

The Commission works closely with the Department of Justice and works diligently to keep the Department of Justice abreast of activities in each of the regions. The Commission meets regularly with the Native American Affairs Subcommittee of the Attorney General's Advisory Committee of the United States Attorneys and cooperates with the Department of Justice and the subcommittee on its regulatory initiatives.

The U.S. Department of the Interior has responsibilities for the acquisition of lands into trust, per capita payments, and other

areas under IGRA. The Commission meets regularly with Interior officials to coordinate activities and discuss matters of mutual interest. The Office of General Counsel participates in joint meetings with both Interior and Justice Department attorneys.

The following are memoranda of understanding with other federal agencies:

- Interior Department Office of the Solicitor Division of Indian Affairs. This memorandum details the process for cooperation between the Commission and the Department on Indian lands determinations under IGRA.
- Interior Department Office of the Solicitor. This memorandum establishes a process for receiving legal services from the Interior Office of the Solicitor.
- Federal Bureau of Investigation. This memorandum establishes the process for FBI processing of tribal employee fingerprints and criminal history checks.
- Office of Personnel Management. This memorandum establishes the process for the completion of routine background investigations initiated by the Commission.

Because a number of Class III tribal-state gaming compacts provide state agencies with a regulatory role in Indian gaming, the Commission has established memoranda of understanding with the following gaming commissions and law enforcement agencies: the Federal Bureau of Investigation, the Colorado Division of Gaming, the Michigan Gaming Control Board, the New York Racing and Wagering Board, the New York State Police, the Kansas Bureau of Investigation, the Oregon Department of State Police, the Illinois Gaming Board, the Indiana Gaming Commission, the North Dakota Office of Attorney General, the New Jersey Department of Law and Public Safety, the Arizona State Gaming Agency, the Washington State Gambling Commission and the Mississippi Gaming Commission. International agreements exist with the New South Wales Casino Control Authority, the Nova Scotia Gaming Control Commission and the Gaming Board for Great Britain. Other collaborative initiatives are under way.

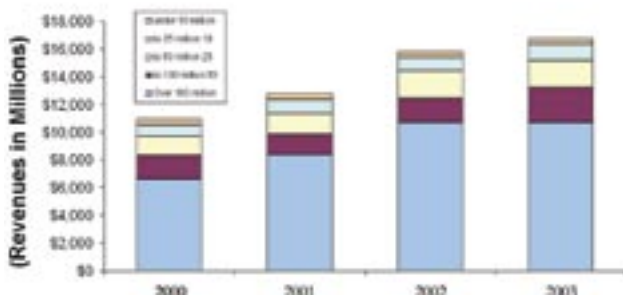
DETAILED REVENUES AND EXPENSES

GAMING REVENUES AND OPERATIONS								
(\$ Amounts in Millions)								
	2000		2001		2002		2003	
\$100 Million and Over	\$ 6,606	31	\$8,398	39	\$9,511	41	\$10,715	43
\$50 to \$100 Million	\$1,694	24	\$1,416	19	\$1,695	24	\$2,460	35
\$25 to \$50 Million	\$1,361	41	\$1,529	43	\$1,979	55	\$1,985	55
\$10 to \$25 Million	\$856	50	\$997	58	\$1,010	65	\$1,145	67
Under \$10 Million	\$442	165	\$482	171	\$465	163	\$426,417	130
Total Revenue/Operations	\$10,959	311	\$12,822	330	\$14,716	348	\$16,730,148	330

REVENUES

The Commission is funded exclusively through fees paid by Indian gaming tribes on Class II and Class III gaming in excess of \$1.5 million. Indian gaming revenues grew at over 14% compound annual growth rate since 1999 while the number of operations increased.

Total Revenues by Category



Although the gaming revenues have dramatically increased, the number of casinos has not grown in proportion to the growth of gaming. Casinos with more than \$100 million in revenues generated 59.6% of total gaming revenues in 1999 compared to 64% in 2003. Casinos with less than \$10 million in revenues generated 4.2% of total revenues in 1999, dropping to 2% in 2003 with the number of operations decreasing by 41 over the same time period. One big factor impacting both overall revenues and the number of large casinos is the growth of Indian gaming in the heavily populated states, with California contributing to a high percentage of the growth.

FEE RATE

The increase in Indian gaming revenue, along with the fee cap and expense control at the Commission level has meant a decrease in fees as a percent of total revenues. In 2000, fees as a percent of the prior year's assessed revenues were nine one-hundredths of one percent of Class II and Class III gaming. In 2004, the number declined to less than seven one-hundredths of one percent. With the increase in the fee cap, continued growth of gaming and expense control, the fee assessment will remain below seven hundredth of one percent in 2005.

FEES AS PERCENT OF PRIOR YEAR ASSESSED REVENUE			
2001	2002	2003	2004
0.075%	0.0665%	0.0635%	0.063%

EXPENSES

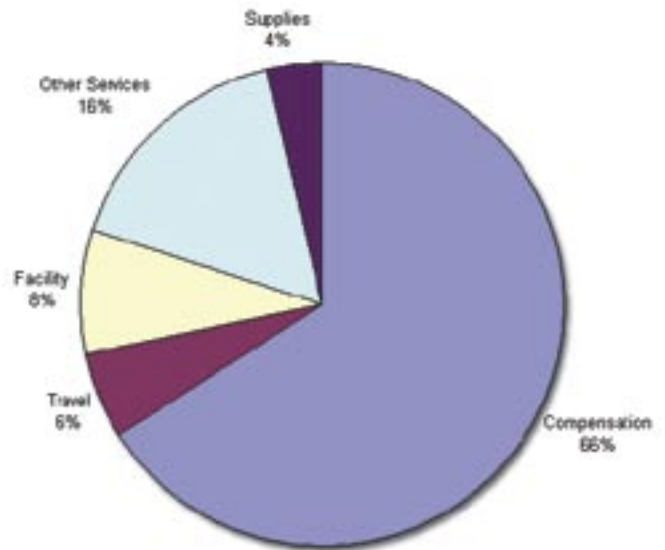
The Commission operates on a lean budget in spite of the breadth of its mission. The Commission is involved in land issues, environment, public health and safety as well as the more typical issues dealt with by state gaming agencies.

While Commission expenses have trended down over the last few years, the Commission has met the challenge and improved regulatory oversight in an industry exhibiting

significant growth. Most of the Commission expenses are somewhat fixed. Compensation, which includes salary and benefits, makes up 65.8% of the Commission's 2004 expenditures. The Commission has been slow to fill positions due to funding concerns. However, with the increase in the fee cap, positions that were intentionally vacant have been filled. The Commission made payments to other governmental agencies for an additional 11.7% of its expenditures in 2004. This includes GSA (rent), Office of Personnel and Management (personnel and background services), MMS (payroll services) and NBC (accounting services).

DETAILED BUDGET (\$ Amounts in Thousands)				
	2001	2002	2003	2004
Employee Count	74	67	63	71
Compensation	\$5,957	\$5,764	\$5,797	\$7,014
Travel	647	321	463	612
Facility	913	905	869	893
Printing & Other Services	693	1,052	876	1,757
Supplies & Equipment	481	149	221	378
One Time Expenditures	593	-	-	-
	\$9,284	\$8,191	\$8,226	\$10,654
Reimbursable Services (Fingerprinting and Background Investigation)	1,367	501	1,128	1,314
Total	\$7,917	\$7,690	\$7,098	\$9,340

2004 Gross Expenses by Category



SENIOR STAFF

Chief of Staff	Vacant
Acting General Counsel	Penny Coleman
Director of Administration	Irene Schrader
Acting Director of Audits	Joe Smith
Director of Contracts	Fred Stuckwisch
Director of Enforcement	Alan Fedman
Director of Congressional and Public Affairs	Shawn Pensoneau

STATISTICS

GAMING	Gaming Tribes-2004	226
	Gaming Operations-2004	400
	States with Indian Gaming	28
	2003 Gross Gaming Revenue	\$16.7 Billion
	Five-Year Revenue Growth Rate	14%
	Management Contracts Approved-Cumulative	42
	Tribes With Approved Revenue Allocation Plans	88
MARCH 2005 STAFFING	Commission and Support Administration	5
	Audit	11
	Enforcement	8
	Management Contract	33
	Legal	8
	Congressional and Public Affairs	13
	Total Staff	1
	79	
	2004 Budget	\$10.7 Million
ACTIVITIES 2004	Casino Visits	600
	FOIA Request Processed	102
	Fingerprint Cards Processed	49,928
	Investigative Reports Processed	31,480
	Potential Notices of Violation	57
	Notices of Violation	4
	Tribal Ordinance Submissions	51
	Tribal Contracts Submitted	34
	Management Contracts Approved	2

REGIONAL OFFICES



REGION 1

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620 SW Main Street
Suite 212
Portland, OR 97205
503-326-5095

REGION 2

801 I Street
Suite 12400
Sacramento, CA 95814
916-414-2300

REGION 3

1 Columbus Plaza
3636 N. Central Ave
Suite 880
Phoenix, AZ 85012
602-640-2951

REGION 4

190 E. 5th Street
Suite 170
St. Paul, MN 55101
651-290-4004

REGION 5

224 S. Boulder
Room 301
Tulsa, OK 74103
918-581-7928

REGION 6

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20005
202-632-7003

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951-676-9000