TRIBAL ADVISORY COMMITTEE; December 8, 2011

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3 TRIBAL ADVISORY COMMITTEE

4 MEETING

5 SUQUAMISH, WASHINGTON

6 VOLUME III

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8 SUQUAMISH CLEARWATER CASINO RESORT

9 15347 SUQUAMISH WAY NORTHEAST

10 CHIEF KITSAP HALL

11 DECEMBER 8, 2011

12 8:11 A.M.

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24 Job No. NJ366120

25 TRANSCRIBED BY: MARY L. GREEN, CCR 2981

1   SUQUAMISH, WASHINGTON; DECEMBER 8, 2011

2   8:11 A.M.

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5   MR. FISHER: Good morning, everybody.

6   Welcome to if I have the count right day nine of our

7   work together. So we do need to talk about our agenda

8   for the day in part, because I'm thinking we do not

9   have a full day's worth of work ahead of us. We should

10   talk about that. We do need to pick up where we left

11   off at the end of yesterday at 543.12 on the player

12   tracking system.

13   Before we get into any of that, anybody have

14   anything on your mind that you want to bring up with

15   the group from yesterday or that you thought about

16   overnight? Tom.

17   MR. WILSON: I consulted this morning

18   with some of our tribal leadership as well as our chief

19   executive officer of gaming enterprise just to talk

20   about this concept of the player tracking and the

21   follow-up to our discussion on promotions, and there's

22   no doubt that we are all in agreement that we need to

23   have some controls around them, but it is definitely a

24   sovereignty issue as far as my tribe is concerned that

25   the regulation of those activities or even the control,

1 that those are viewed as business activities, and there

2 would even be discussion at the tribal gaming office

3 level in terms of how we would regulate or not regulate

4 those particular types of things.

5   In difference from the NIGC standpoint, I need

6 to go on record that we view those as sovereignty

7 issues and that they're best left up to the tribe to

8 determine how they're going to manage the risks

9 associated with that.

10   MR. FISHER: Matt.

11   MR. MORGAN: I thought about this a lot

12 last night on this subject. I completely agree that

13 you operate a gaming operation, and if you have clear

14 tracking, it is an area that needs to be controlled.

15 My dilemma as always is who has the authority to

16 control it?

17   One of the things I thought about this

18 morning, because I told you yesterday I feel really

19 split sometimes, you know, on this. I look at it from

20 a lawyer's perspective sometimes, and sometimes I look

21 at it from a regulator's perspective to try to come to

22 terms with what we're doing or what I do as the

23 commissioner at Chickasaw.

24   As a representative of the Chickasaw Nation, I

25 don't think I could support, you know, this being in a

1 federal regulation. With that being said, I do want to

2 bring up and make sure the group understands if we do

3 say that, NIGC, this is not your area, that doesn't

4 mean it's not anybody's area.

5   You know, Former Chairman Colby had this term

6 he liked to call the federal family. One of the things

7 we talk about in Indian gaming is that we are the most

8 regulated gaming industry in the world when you look at

9 federal, if you have compact and joint relations with

10 the state, tribal level.

11   There's lots of groups that possibly have

12 authority over this area, and just because we say,

13 NIGC, you don't have the authority doesn't mean that we

14 may not have to deal with one of your brothers from the

15 federal government when you start talking about DOJ or

16 IRA or a multitude of others that we deal with in

17 gaming law on a day-to-day basis.

18   The other part of that is, because I do like

19 Phil's approach. He'd always give deference to the

20 tribal regulator. We're kind of in the background

21 overlooking stuff with the federal family.

22   That being said, one of the things I heard

23 yesterday was a concern about the agency being very

24 focused on enforcement. I think, you know, if the NIGC

25 changes some of its issues, changes some of its thought

1   processes and becomes more of an agency of technical

2   assistance, training, that just because -- I think this

3   is where the discussion comes up with the class 3

4   world. Just because you may not have the ability to

5   enforce something doesn't mean it's not a good idea to

6   train on it and provide assistance on it and maybe even

7   speak to it.

8   I know there are several within that federal

9   family that feel that unless I can come in and issue an

10 NOV or enforce, then what's the use of talking about

11 it? I think there's great utility on speaking on some

12 of these subjects that we all agree need to be

13 controlled.

14   While I still believe you may not have the

15 authority to do it, somebody needs to do it. It's a

16 good thing to speak to to make sure that at a local

17 level somebody is looking at these kinds of things.

18   I think you'll even see this when we get into

19 class 2 gaming systems, because remember that's a

20 system whether this subject touches that and what kind

21 of effect it may or may not have. There's other

22 avenues to reach your goal other than through a

23 regulation.

24   MR. FISHER: Anybody else? Anything on

25 your mind? Do you want to start by talking a little

1   bit about the agenda for the day? We are scheduled to

2   go to 5:00 p.m. It appears to me that we don't have a

3   full day's worth of work ahead of us, which means that

4   we might end up getting done early.

5   We have -- at least on my list we have 543.12,

6   which we spent a fair amount of time talking about

7   yesterday and which may or may not go quickly. We

8   talked about doing the bingo guidance document, and

9   NIGC is prepared to do that, right?

10   MR. LITTLE: Uh-huh.

11   MR. FISHER: Then we have a couple of

12   housekeeping things to deal with including projecting

13   ahead a little bit partly for the January meeting,

14   maybe even a little further ahead.

15   There was some discussion, Dan, before you got

16   here about -- because I mentioned I don't think we need

17   -- we might not need nine full meeting days to get

18   through the rest of our work as laid out on the work

19   plan, and so people were more than willing to jettison

20   Kansas.

21   MR. CULLOO: To replace with Florida.

22   MR. FISHER: So we need to talk a little

23   bit about how many meeting days we have left and

24   whether people should be making arrangements for those

25   days or not and then anything else we need to cover.

1   Even with all of that, that could still be

2   just about a half a day's worth of time with a wild

3   guess estimate. It could take longer. It could be

4   shorter. That's what I think we need to cover before

5   we're done today.

6   MR. LITTLE: That sounds fine to me.

7   MR. FISHER: What about everybody else?

8   What are you thinking that we need to do?

9   MR. RAMOS: I have one issue with the

10   February meeting. I don't think a date has been set on

11   the February meeting yet.

12   MR. LITTLE: It has not, and that's

13   because we're still trying to tie down a location, and

14   we're pretty close to that, so I think you should have

15   some information here within the next week or so.

16   MR. FISHER: Anybody else have anything

17   else on the agenda or what we need to cover today

18   before we're done for the day? So I'll just keep

19   checking with you around kind of whether there are

20   other things we need to do and how we're doing timewise

21   in terms of these various topics. Tom.

22   MR. WILSON: I do -- since the checklist

23   was sent out to us yesterday, if we could talk briefly

24   about those. I know I have some comments about the

25   checklist that I would like to share with the group.

1   MR. FISHER: Tom, I sent it out at the

2   end of the day yesterday. We're having some e-mail

3   transmission glitches, and there are at least some

4   people around the table who did not receive it yet.

5   Michelle?

6   MS. STACONA: I can't even open it.

7   MR. FISHER: It's a zip file. It's in a

8   zip file because it's a lot of documents.

9   MS. STACONA: I prefer not to talk about

10   it before I get a chance to open it.

11   MR. FISHER: We may need to put that on

12   the agenda for the next meeting. I didn't get any

13   bounce back messages. I got one bounce back message,

14   which was the result of a bad e-mail address, which I

15   fixed, so I haven't gotten any server rejects yet, but

16   obviously if you haven't gotten it in a short period of

17   time or if you can't open it for some reason, let me

18   know and we'll figure out a different way to send it

19   off to people.

20   MR. LITTLE: I prefer we probably put

21   this on our website, but if it's going to change,

22   should we wait or should we put what's up there now?

23   Should we put the disclosure?

24   MS. LASH: They're definitely not

25   anywhere near final form.

1   MR. FISHER: I did not send it to read

2   it to put on the web based on your message.

3   MS. LASH: I actually haven't even had a

4   chance to look at it either, so maybe we should wait

5   until we have a chance to discuss it.

6   MR. LITTLE: Because if we could get

7   everyone to go online and download it --

8   MS. LASH: They'd go what's this?

9   MR. WILSON: There's fundamental issues

10   with those checklists.

11   MS. LASH: I can only reiterate what I

12   was told that they were in the process of working on it

13   and then had conversations with your office that

14   clearly the checklists were going to change as the

15   documenting evolved, so everything just kind of

16   stopped, so where they are is just kind of a middle of

17   the process state right now.

18   MR. FISHER: It sounds like they're in

19   the working form and they're not ready to be posted.

20   MR. LITTLE: I definitely don't want to

21   confuse people. Brian might go and download them and

22   get a different copy.

23   MR. FISHER: Anything else before we

24   turn back to 543.12? Okay. So when we broke for the

25   evening yesterday, we hadn't had a discussion about

1   what to recommend for 543.12, and we asked that

2   everybody think about this overnight, figure out what

3   it is you wanted to do, so maybe we should just check

4   in. People can just check in about what you're

5   thinking or we can do kind of a vote test if that's

6   what you prefer. How would you like to proceed?

7   MR. McGHEE: I understand where

8   everybody's coming from. Do they have authority? Do

9   they not? At the same time, we have to consider the

10   fact that even though we may recommend that they don't

11   have authority for this and that's our recommendation

12   and they decide that they're going to publish it

13   anyway, the only way that would be hassled out is in

14   some kind of challenge.

15   Do we really want to be able to just -- our

16   recommendation be that we don't think you have the

17   authority or should it be we don't think you have the

18   authority, however, if you choose to exert what you

19   think is your authority, here's our recommendations,

20   because otherwise you're going to send forth a document

21   that you haven't even given any comment on that could

22   end up being in the Federal Register at the end of the

23   day, and we haven't made any comments on their copies,

24   which is what we're here for is to advise on the

25   comments.

1   I don't know at the end of the day, like I

2   said, if we recommend to do whatever but not have any

3   input on it, then you risk a document being published

4   that you basically didn't say anything about.

5   MR. CULLOO: Daniel's question has

6   always raised kind of a red flag in my mind, the

7   process as far as the NIGC with their recommendations.

8   What I heard yesterday was at least concern on your

9   part, Daniel, that if we choose not to put something

10 in, it could be a concern. Is it realistic I think was

11 your word.

12   What it tells me is that what Daniel said is

13 that we could maybe go test it and say we don't want it

14 in there, and then NIGC could come back later and say

15 we believe something should be in there.

16   The question is at what point does NIGC during

17 this process say we think this should be in there and

18 not this? Is it wait until the whole project is done,

19 we make the recommendations, we're gone, and then you

20 guys sit down as a group and go through it and say we

21 like this, we don't think this is strong enough? What

22 step is that process happening with NIGC?

23   MR. LITTLE: I'm just one of three

24 commissioners, so I only have one out of three votes.

25 We're going to thoroughly review everything that this

1   committee provides us.

2   You know, I don't think it would be a good

3   exercise of everyone's expertise around here for me to

4   make a decision right now that yes or no we're not

5   going to go there. We want to hear all the options.

6   That was the reason for my saying that and the chairman

7   saying that two days ago is that we need to have

8   realistic expectations of what we can get accomplished

9   here.

10   MR. CULLOO: Is the full commission not

11   going to meet until we're done with the process or each

12   time?

13   MR. LITTLE: We have discussed these,

14   although we haven't received any recommendations yet.

15   I'm not sure where those are. You know, I do updates

16   for them, and they know the progress of where we are,

17   you know, with this meeting and, you know, some of the

18   topics and, you know, high points that we've covered

19   here, but we're not -- we're going to review everything

20   in the whole before we make decisions, because as we've

21   already seen, things that we're doing in one section

22   has consequences and effects on another section here.

23   You know, we still have six or eight more

24   sections to cover, so we'll definitely wait until, you

25   know, we conclude going through all these sections

1   until we can make the best possible decision.

2   MS. LASH: I think this is a good point

3   in the road to just touch on what Matt said earlier.

4   There are clearly areas where we're discussing topics

5   that are outside the jurisdiction of the NIGC, this

6   being one of them, and it's also important to point out

7   that it is valuable for tribes to have guidance and

8   direction on some of these topics and I think what we

9   did yesterday with the promotions indicating that a

10   bulletin would be appropriate and we could go into

11   detail on the specifics of something of the topics and

12   the areas that should be included for guidance on

13   topics like player tracking or promotions for use by

14   the NIGC in formulating their final product.

15   But I just think we need to keep in mind that

16   I think it's inappropriate that we recommend that

17   something be a regulation when there's not any

18   jurisdiction in that area.

19   MR. McGHEE: I was saying that you may

20   recommend that it not be regulation, but I definitely

21   wouldn't let it pass by with that alone without

22   discussing in case they don't accept it.

23   MS. LASH: We should discuss it and have

24   the appropriate detail that gives you a comfort level.

25   They're on the right track for what the tribes would

1 need to see.

2   MR. WILSON: Just to follow up on the

3 comment you made, is it beneficial, then, because there

4 is such a time constraint in trying to get all of this

5 done, recognizing that that's one of the paramount

6 goals that you have for areas that we have already

7 discussed, so let's say 547, the technical standards,

8 would it be beneficial, then, that we get those to you

9 and would the assumption be that NIGC would start those

10 in the pipe process, you know, federal review process,

11 everything, as opposed to waiting until we're totally

12 done with everything?

13   MR. LITTLE: I did hear there was some

14 discussion going on about that, and on the surface, you

15 know, it sounds fine to me. I'm just not sure if this

16 group is going to come across an area as we continue it

17 along, because there are some, you know, references to

18 the technical standards. Will there be any changes

19 that you may want to go back and touch upon? I don't

20 know.

21   You know, if the group decides they want to

22 wrap up those recommendations and send them to us, you

23 know, I think we'd definitely like to look at them.

24 We've got some, you know, I'm sure some flexibility in

25 there that if you do come across some changes, you

1 know, later on in this process here that we can adjust.

2   It will take us a little while to go through

3 them and then formulate, you know, a draft in the way

4 that we've done these in the past. We've probably got

5 about six or eight in the pipeline in some form,

6 whether it be a draft. The chair was here on Monday.

7 He was consulting on our proposed rules and some of our

8 draft rules we have out there.

9   We had generally in the past put things in a

10 draft form on our website and then -- before we

11 formally published them, so we haven't made any

12 decisions yet, but I assume we may try to go along that

13 path if time permits. It could be helpful if the

14 committee decides they want to get those to us early.

15   MR. FISHER: Do you know how you would

16 like to receive them officially? What official stamp

17 do you need from the group? Who does it get

18 transmitted to? What form does it have to be in? Have

19 you thought anything about that?

20   MR. LITTLE: I don't think so, no. I'll

21 leave that up to the committee, I would assume.

22   MR. FISHER: Because it will become part

23 of the public record, so if there is any guidance to

24 the group about what it needs to say and how it needs

25 to be presented, then they would need that now sooner

1 rather than later.

2   MR. HOENING: There's no required

3 protocol right now. We can certainly come up with

4 something.

5   MR. FISHER: Think about if there is

6 something that you need the group to do to say this is

7 our final work product and here it is that represents

8 the group's work.

9   MR. MAGEE: I'd like to discuss maybe

10 not at this meeting but a couple meetings down the road

11 how we package this and get it ready for submittal.

12   MR. FISHER: It actually is on the work

13 plan, but it's -- it was on the work plan, I think, for

14 the meeting 5. We're obviously getting there faster.

15 I think it should go on the agenda for the next

16 meeting, because the technical standards document, once

17 you see all the compilation of all the changes, that

18 document could be ready to submit by the next meeting.

19   MR. MAGEE: Are we going to do like a

20 final review to make sure we're all in agreement?

21   MR. FISHER: Absolutely.

22   MR. McGHEE: If I know what we're

23 thinking along the lines of this is in the authority,

24 this is outside the authority, I mean, if the group

25 takes on that approach, then it probably needs to be

1   discussed that if that is the one view, then that also

2   means -- does that mean lines of credit isn't up for

3   discussion and deposit accounts isn't up for

4   discussion?

5   Because it's the same concept. Those are not

6   things that have to be regulated. I mean, not

7   regulated or not -- excuse me. You're looking at

8   possibly one, two, three, four other sections or at

9   least three other sections we haven't even discussed

10 that we will need to discuss.

11   I just want to know if the same way of

12 thinking that way let's go ahead and identify the areas

13 that that would infringe upon so we know. If I'm going

14 to go back and ask my opinion about player tracking,

15 I'm going to ask them about comp services and lines of

16 credit, not just one, instead of getting there and

17 saying this is one of the other things. Can we talk

18 about that?

19   MR. MAGEE: I think outside of the

20 jurisdiction it's appropriate to be part of the

21 regulation or not there is the practical reality that

22 some of these areas are problematic, and player

23 tracking, promotional marketing, there are inherent

24 problems that surface with this.

25   Although they may not be right for part of

1   their regulations, what Robin said is maybe they will

2   be part of some sort of guidance document and/or

3   bulletin. Yesterday we even shot down the bulletin.

4   Just thinking out loud on this and trying to

5   think of the approaches to this, I'm trying to think of

6   and put it in perspective of the jurisdiction and also

7   put it in real perspective in real time the practical

8   nature of the issues.

9   In my mind, if I can prevent a start-up

10   property or another property having to face, you know,

11   the same problems that we went through, you know, learn

12   from it and go through guidance documents or some sort

13   of bulletin. I don't know. That's what I'm thinking.

14   I get the legal side of it, but I also understand the

15   practical side of it as well.

16   MR. FISHER: Daniel, when would you

17   propose that we talk about what you just said? Before

18   we leave today?

19   MR. McGHEE: Yeah, because what I'm

20   getting is an overall -- I think each tribe or each

21   person here is going to have to have an opinion not

22   just on player tracking. It's going to have to be on

23   the concept of NIGC's jurisdiction in some of these

24   areas.

25   So maybe at least so I'll know by the next

1 meeting we've identified these four areas that we need

2 to talk with my tribe about and see if they're on board

3 with so when I come back here I can say my tribe is in

4 agreement that we don't think you have the authority or

5 jurisdiction or we wish you had on these areas, because

6 it's not not player tracking. It's the concept we're

7 talking about here. I'd rather know that before I

8 leave.

9   MS. LASH: Maybe it's better to hold

10 that off as well and just stay where we were with going

11 over bingo and give everybody a chance to speak with

12 their tribal leadership and legal counsel and kind of

13 maybe come back with more a confident level.

14   MR. McGHEE: I'd just as soon not talk

15 about player tracking anymore.

16   MR. LITTLE: Everybody agreed and it was

17 very clear in the nomination process for this position

18 that you came here with the ability to speak on behalf

19 of the tribe.

20   MR. McGHEE: I thought I was here to

21 defy you on these sections right here that you had on

22 the agenda. That's what I was going to do.

23   MR. FISHER: Tom, then Jason.

24   MR. WILSON: What I'd like to propose is

25 that on those areas -- Daniel, I agree that a vacuum is

1   never a good thing, and by not talking about these

2   things, there could be the appearance that there is a

3   vacuum, and as much as this is about educating people

4   as well as deciding on things, it seems to me that on

5   those areas, I certainly would be very comfortable

6   advocating that on those areas where we don't believe

7   that NIGC has the regulatory authority that the

8   discussion still take place about the inherent risks

9   and controls that should be in place but the

10 recommendation being that NIGC take a training role in

11 training tribes on the risks in those areas as opposed

12 to regulating, and for me, that then causes the

13 discussion to happen amongst the group and people to

14 become educated about the risks that are inherent in

15 those things but allows me to then from my tribe's

16 perspective endorse the concepts without endorsing that

17 it needs to be regulated from a federal level.

18   That would be my approach to trying to work

19 through this issue on those topics where we think

20 there's a jurisdictional sovereignty issue.

21   MR. FISHER: Matt.

22   MR. MORGAN: I agree with what Tom said.

23 Just as a point of reference for the group, while it

24 was before my time in the gaming, originally the first

25 internal controls stated were offered by subcommittee

1   of NIGC as best practices because of this very subject,

2   things that needed to be done but who had the authority

3   to do it, so they got around that issue by issuing them

4   as guidance for tribes to take up.

5   It was only when the NIGC kind of jumped on

6   the band wagon and said, yes, but we need

7   enforceability and switched it to regulations that some

8   of this tension came up, you know, because, you know,

9   even then the industry theory that you needed best

10   practices throughout the entire country in order to run

11   your operation.

12   That's one of those dynamics that had been

13   going on for 20-plus years on what is the role of the

14   NIGC? Do they have the authority and can we get there

15   through bulletins and guidance as opposed to

16   regulations?

17   I wholeheartedly endorse Tom's point. If you

18   want to talk about guidance documents and training and

19   things that need to be covered out there for smaller,

20   for newer, as refresher, keep in your mind as you're

21   running your operation. I can get behind that

22   statement.

23   MR. WILSON: I have one follow-up on

24   that. In my discussions this morning with my peeps,

25   one of the things that we talked about -- and this has

1 been certainly something that I have been advocating at

2 our tribe and in my dealings with other tribes -- is

3 that there has been a general lack of tribes taking

4 advantage of the regulatory authority that they have to

5 move some of these issues forward, and what I mean by

6 that is that -- and our tribe was no exception in this

7 regard -- that when the minimum internal controls were

8 put out, and, you know, ideally this was all supposed

9 to be a framework with which tribes would build off of,

10 but what happened in so many cases is the MICS were

11 adopted and then that was it. It just stopped at that

12 point.

13   Every tribe through IGRA has the ability to

14 determine the level of additional regulatory oversight

15 that they wish to grant to the NIGC through ordinance,

16 so sometimes I think that we tend to forget that as a

17 sovereign, you have the ability to bring in additional

18 regulatory oversight from different things. I mean,

19 that certainly happens through the compacting process.

20   So for us in our discussions this morning, we

21 recognize that there's an obligation of our tribe to

22 step up to the plate and take responsibility for those

23 things that we have sovereign control over, and I just

24 think sometimes that that message gets lost in tribes

25 that there are avenues out there for which you can

1   achieve some of the things, so for a tribe that really

2   does not have the expertise or have the ability to do

3   some of these things that are being advocated, they do

4   have the ability to increase regulatory oversight or

5   invite the NIGC in to provide that from a regulatory

6   standpoint.

7   So I just want everybody to recognize that

8   there are avenues out there that I think sometimes get

9   lost in the discussion.

10   MR. FISHER: What does that mean for

11   what we should do right now? Should we talk about

12   543.12 or do we need to come to a resolution about how

13   to address this depending on what the decision is in

14   543.12?

15   MR. WILSON: I would move again that,

16   you know, if this furthers to get the conversation

17   forward, then I would propose formally to the group

18   that those items where we do not have consensus in

19   terms of sovereignty issue that we still hold

20   discussion and debate for benefit of education and

21   understanding of the issues but that we approach it

22   from that our recommendation would be an educational

23   role as opposed to a regulatory role for dealing with

24   those issues.

25   MR. FISHER: So are people willing to do

1   that? We need some response to Tom's suggestion.

2   Brian.

3   MR. CALLAGHAN: The comical statement I

4   made yesterday about the soft regulations is the idea

5   as I see this is below the line guidance. Certainly

6   you don't have any -- certain opinions say that you

7   don't have the regulatory authority over this

8   particular area.

9   However, I agree and I think the purpose of

10   this brain trust here is to come up with a minimum

11   internal control standard. I see this as there's

12   regulatory requirements and also a complete grouping of

13   MICS that can be addressed, and that is below the fold.

14   That's below the line.

15   Those are the areas where the NIGC would go in

16   and audit, and then there would be that NOV aspect, and

17   then the other aspect of this is the best practices,

18   which could very well extend upon things that we have

19   not touched upon that are still critical to the

20   operation.

21   MR. FISHER: There's a couple of

22   different ways to go.

23   MR. MAGEE: I think yesterday when we

24   left we were just about to test this for a vote.

25   MR. FISHER: Uh-huh. The question where

1 we were at the end of the day yesterday if I'm

2 remembering correctly was to test like we did with the

3 promotions whether to -- two questions, whether to

4 basically remove this section from the recommendation

5 or to delete this section, and then if so, should there

6 be any recommendation with respect to guidance or a

7 bulletin?

8   We talked about either doing them separately

9 or doing them combined. If we're going to do it, I

10 think it would be easier to do it separately, separate

11 it out. So the first question would be what do people

12 think about either including this or removing it and

13 then depending on what the answer is figure out whether

14 we need to talk about guidance or bulletin.

15   Are people willing to test it? So if you

16 support deleting 543.12 as presented in the TGWG

17 document from the tax recommendations, raise your hand.

18 Is that a hand raised, Daniel?

19   MR. McGHEE: No. This is whatever.

20   MR. FISHER: That got us everyone but

21 three. Kathy, was your hand up?

22   MS. HAMEL: (Shaking head).

23   MR. FISHER: That's everybody but four.

24 For those of you that -- let's just check. Those of

25 you that didn't support it, do you oppose it? If you

1   oppose it, raise your hand. That would be zero. If

2   you're willing to abstain, raise your hand. That got

3   three. That's called you're not ready yet. What it

4   means is we don't have consensus if you're not ready

5   to.

6   MR. McGHEE: I abstained.

7   MR. FISHER: If you abstained, then that

8   means that we have consensus to delete this. So then

9   the question is as we did with the promotions, what's

10   your -- do you want to present any guidance -- a

11   recommendation to NIGC either with respect to issuance

12   of guidance or a bulletin for this -- for the player

13   tracking system subject?

14   MR. CULLOO: Could someone explain to me

15   the different things it can be? I understand the

16   bulletins, and the question was raised to some people

17   the bulletin becomes a reg. What are the options? You

18   don't post guidance.

19   MR. LITTLE: I think bulletins are

20   almost like a vehicle for providing in essence a

21   guidance. It's, I think, a common nomenclature. We

22   call them bulletins, and it's basically a best practice

23   representation, guidance.

24   MR. HOENING: You can find guidance in

25   other places on our website. The introduction to the

1 environmental public health and safety section has some

2 pointers on there, and some people would argue that's

3 guidance.

4   It's not anything that has force and effect of

5 law as a regulation would, and it may not rise to the

6 level that some people are saying, but essentially a

7 bulletin is a form of guidance. There's no force and

8 effect of law. It's not enforceable by the agency, so

9 it is basically a form of guidance, but the guidance

10 could theoretically take all kinds of forms.

11   MR. McGHEE: How much of your resources

12 would you put on training and putting out guidance and

13 bulletins on something that you don't have authority to

14 do? Then you start spending money or time on things

15 that's not even in the realm -- if it's being not in

16 your authority, why would you do it?

17   MR. LITTLE: That's a very good point,

18 and we do do training on things outside of the

19 regulatory authority we have. We train on what the

20 tribes request we train. You know, we have the

21 expertise, and if a tribe comes to us and asks us for

22 something, we're going to do everything we can to try

23 to provide that training.

24   One, it's required by law, so it's something

25 we have to do, and it's something that we feel strongly

1   that we should do. It's good for the industry. It's

2   good for our underlying goal of, you know, maintaining

3   compliance. That's where we want to be. That's the

4   effort of this commission.

5   You know, we made some recent organizational

6   changes. We have a new division of compliance for a

7   reason, because that's the underlying goal is to have

8   everyone in compliance so we don't have to take

9   enforcement action.

10   MR. McGHEE: If it's not for your

11   authority --

12   MR. LITTLE: It complies with the laws

13   and the regulations.

14   MR. McGHEE: I'm saying if they want

15   bulletins and training on something that's not a

16   regulation or authority, would NIGC still put time and

17   effort into something that's not a reg or within your

18   authority?

19   MR. LITTLE: Yes. We have done that,

20   and I assume we'll continue to do that.

21   MR. FISHER: Did that answer your

22   question, Leo?

23   MR. CULLOO: Yeah. It sounds like

24   you're saying that some levels at a higher standard or

25   level of where a bulletin gives an expectation, has a

1   little more behind it than, say, another format.

2   MR. HOENING: I can't speak for how

3   people in the industry interpret bulletins versus any

4   other kind of guidance. I can only say that the

5   bulletins don't carry any more force and effect than

6   any other kind of guidance. It is all just a kind of

7   guidance.

8   MR. McGHEE: I've always viewed them as

9   recommendations, opinions, you know.

10   MR. FISHER: Matthew.

11   MR. MORGAN: Sort of on this topic, you

12   know, I agree with Mike that protocol comes forward and

13   you have lots of vehicles to deliver that message. If

14   hearing some of the conversation yesterday on people

15   being apprehensive of what you do with some of these

16   things, I think that did go back to, you know -- Dan, I

17   think you and your commission are doing a wonderful

18   job, and you all are changing some of the environment,

19   and you all are moving down the road the way I see as

20   proper. I want to make sure that you understand I do

21   think you all are doing a good job, and I know it takes

22   time in order to effect change.

23   In years past, when we look at your make-up of

24   enforcement versus training, even today, you know, as,

25   you know, what is your training budget and how many

1   resources have you put into training, you know, as you

2   begin that change in your culture, my hope is that

3   people get more comfortable seeing your office as not a

4   hammer but somebody to go to as a resource in order to

5   help them, assist them, get to places where as an

6   industry we need to be.

7   You know, I hope bulletins or guides or

8   whatever you want to call them become more commonplace

9   and that we do work in partnership with all of your

10   resources out there, everybody in the federal, you

11   know.

12   I know you started talking more to your state

13   counterparts and some of the state regulatory bodies to

14   see how they do it in the industry, because sometimes

15   that's helpful to see how other people in the industry,

16   whether it's commercial gaming or charitable gaming, do

17   something and is that applicable in tribal gaming?

18   Mostly you work with your tribal partners.

19   You're regulatory bodies. You're elected officials.

20   You're tribal law enforcement, because there are some

21   great resources out there to be had and to make sure

22   that we as the industry rise up to the level that we

23   need to be meeting.

24   When I go out and look, I think we're doing

25   really well. I think you see that just based on the

1 lack of publicity as a whole that the industry sees.

2 That's a pat on the back to everybody, operational,

3 regulatory, at every level that's doing a good job, but

4 that change in culture -- and I know it takes time.

5 Like I say, I think you're doing a good job. When

6 People begin to view you all a little differently, I

7 think that's going to be helpful down the road.

8   MR. LITTLE: I appreciate those words

9 that you said, and training is a major focus of this

10 commission. We've identified four major priorities,

11 and that is training and technical assistance is one of

12 them, and it's done for a reason.

13   You know, I think in the past the commission

14 has kind of struggled getting kind of set up a

15 structure because of the historic structure of the

16 organization. We had a division of one person that was

17 our director of training, and that was the only person

18 in training, and basically we would set up trainings,

19 and he did a good job at that, but then he would have

20 to rely on the other divisions to volunteer their staff

21 to provide the training. We have a limited staff. To

22 dedicate them to do training was an additional, you

23 know, task that was not kind of, you know, often

24 scheduled into their overall work requirements.

25   Now, I don't want to confuse training with

1   technical assistance. They're two different things.

2   Our staff, including Rest and our compliance officers

3   that we call field investigators, when they go out in

4   the field and they're doing their site visits and they

5   meet with a tribe and they come across an issue, they

6   do technical assistance immediately whether it's

7   organizing ad hoc training.

8   These guys are great, and they do a wonderful

9   job. I've witnessed what they do, and they're

10   dedicated and very helpful, and we'll continue to do

11   that and expand more upon that.

12   But a lot of it has to do with the

13   relationship those folks in the field have with their

14   tribes. In different parts of the country, it's

15   fantastic. In other areas, you know, it could be

16   improved, so we're working on that and just kind of

17   getting the message down to our staff that this

18   training and technical assistance is a vital component

19   of their responsibility.

20   I appreciate those comments, and thank you.

21   It does take time, but I think we're getting there.

22   MR. CALLAGHAN: With the technology

23   today and conceptually with the idea that somebody may

24   not want to raise their hand directly -- and I

25   recommended this before -- is online training. Is

1 there some way that we could go in and even -- and this

2 may be going to Nth degree, but even a help desk or a

3 help desk e-mail communication where someone came up

4 with a question, a technical question with definitely

5 online training. That's the biggest bang for my buck

6 is acquiring slot training. IGT advantage we can do

7 online training.

8   There's a number out there, and I think I

9 thought that typically when you take a look at your

10 resources, if you're to go in that direction, I think

11 it would be incredible.

12   MR. LITTLE: All great ideas, and we

13 have talked about this before. We've got our staff

14 working on it. We do have some structural issues with

15 our own capability, our technology capabilities within

16 the agency. We're working on areas where we can

17 partner with some of our sister agencies, including the

18 Department of Interior, to tap into some of their IT

19 capabilities, utilizing webinars and online training.

20   We're looking as far as partnering, you know.

21 There's no reason why we can't partner with some of the

22 tribal associations that are doing training. A lot of

23 folks do great training. Partnering with them,

24 partnering with some of the manufacturers in the

25 industry, some of the testing labs, you know.

1   There's nothing out there to say that we're

2   the only folks that can provide the training. There's

3   a lot of other organizations that are doing it that are

4   being responsible members of this industry, and there's

5   no reason why we can't partner with them and look for

6   areas.

7   We've all got one goal, and that is to, you

8   know, help this industry, you know, continue to provide

9   strong regulation and identify areas where we can look

10   for improvement, so we're working on that. It's

11   definitely something I think we're all in agreement on,

12   and we'll continue to kind of update you guys as we

13   make progress on that.

14   MR. FISHER: Are we ready to see if

15   there's something that you want to recommend now to

16   NIGC with respect to the player tracking systems? Bear

17   in mind that we have said people want to talk about the

18   general concept, and I have it on the list -- that

19   concept on the list of things to talk about at the next

20   meeting.

21   MR. LITTLE: Can I make one statement?

22   There's been a lot of conversation about, you know,

23   sovereignty and authorities of the commission. Like I

24   said yesterday, I'm not going to talk about our

25   authority. You know, don't confuse my silence with,

1 you know, just agreeing with what's been said, but it's

2 really important to me, that, you know, these

3 discussions are, you know, gone through. I'm

4 interested in hearing what everybody has to say.

5   How you decide to make your recommendations,

6 you know, I'll leave that up to you. However, it is

7 very helpful to discuss the issues, you know. Then

8 whether or not you decide you don't think it's

9 something within our authority, I don't want to discuss

10 that, but, you know, it is helpful for us to hear the

11 discussions on the matters.

12   MR. WILSON: You know, it seems

13 yesterday that we certainly had a consensus that the

14 guidance needed to be stronger, and so, I mean, I think

15 that is something that could be voted on. Whatever

16 form the guidance takes, it seemed yesterday that we

17 were all in agreement that that could be a better

18 document and that there's definitely issues there that

19 need to be addressed from a guidance perspective. When

20 I use the term guidance in this context, I don't mean a

21 regulatory attached guidance but best practices.

22   MR. FISHER: So what would that -- do

23 you want to talk about what would be included or just

24 the general recommendations of including -- of saying

25 that NIGC should publish best practices or something

1   like that? Do you want to do the overall thing or do

2   you want to do what it would also include?

3   MR. WILSON: I don't know. I just

4   recall yesterday we had this general -- I mean, I for

5   one did not disagree with any of the comments that NIGC

6   had about concerns with the risks associated with

7   player tracking system, so I agree that those concerns

8   are valid and that any guidance or training that could

9   be done would be a beneficial thing.

10   MR. MORGAN: From my chair, I think it

11   is useful to say that the guidance best practice

12   document or whatever term you want to use needs to be

13   stronger.

14   If you got these expertise around the table

15   and people have specific ideas or at least general

16   areas that need to be stronger in this area, if there's

17   something that needs to be included to some of the

18   concerns that you brought up, I think it would be

19   appropriate at the very least to list the subject or

20   areas that you may see some weaknesses in while you

21   have us assembled, because to me yesterday there were

22   clear ideas that people thought clearly there was some

23   weaknesses in the documents, and they're probably

24   better to articulate what the weaknesses were.

25   I don't think we have to get into a line by

1   line discussion of what the document needs to say,

2   because conceptually this area needs to be

3   strengthened, and we missed this whatever that may be

4   may be helpful in that regards.

5   MR. FISHER: Maybe we should just spend

6   a few minutes fleshing that out and then we can come

7   back and see what people think of the idea of making a

8   general recommendation on guidance, bulletins, or

9   training to NIGC. Unfortunately, I had that whole list

10   in a recommendation, and when the recommendation went

11   in a different direction, I deleted it all.

12   MR. WILSON: If we need to go back

13   through the document, then let's.

14   MR. FISHER: I think it would be useful

15   just to do that, because there are some specific things

16   that they recommended, and that list got incorporated,

17   and there was a general comment that you made, Tom,

18   about emphasizing the importance of this area and the

19   potential for abuse or something similar to that.

20   MR. MAGEE: Robert, it seems like a

21   point of order is that we need to determine whether

22   we're going to as a group determine whether the

23   guidance document is needed or not before we go down

24   and start going through line by line in the guidance

25   document. In the end we may not include it and it will

1   be a waste of time. Let's determine that first. Are

2   we going to include a bulletin or a guide document in

3   lieu of?

4   MR. McGHEE: We didn't include a

5   bulletin in the promotions. We said no bulletin.

6   MR. WILSON: Let's ask the question,

7   then.

8   MR. FISHER: Let's test it. The

9   question is if you support recommending to NIGC that

10   there be guidance or bulletin or best practices for

11   player tracking systems, raise your hand.

12   MR. McGHEE: At the very least? Is that

13   what you're asking?

14   MR. FISHER: As a minimum, yeah. So

15   that got everybody except one person. If you're

16   opposed, raise your hand. If you're willing to

17   abstain, please raise your hand.

18   MS. TAHDOOAHNIPPAH: I think I'm only

19   comfortable recommending such if we actually were to

20   sit down and write up the kind of exact bulletin to say

21   we recommend a bulletin and this is what we're

22   recommending, this bulletin in these words.

23   MR. MAGEE: I kind of agree with that.

24   We should actually see it in written form.

25   MR. FISHER: What that means is that we

1 need to task someone or --

2   MR. McGHEE: Did she abstain?

3   MR. FISHER: She did.

4   MR. McGHEE: So we had a consensus?

5   MR. FISHER: Correct. We need to ask if

6 somebody or task a small group of folks to go and

7 develop a draft of what the guidance or bulletin or

8 whatever the recommendation with look like and bring

9 that back to the full committee unless you want to

10 spend the time --

11   MR. LITTLE: We already have a guidance.

12   MS. LASH: I think the working group's

13 guidance gives guidance. That's a good starting point.

14 Do we just want to say are there areas that need

15 strengthened or are there areas in the guidance here or

16 would we recommend this as the guidance?

17   MR. FISHER: Maybe I should have framed

18 the question for consensus differently. That's a good

19 question, because the discussion yesterday was around

20 strengthening the guidance that was presented. Robin's

21 question is in essence do you want to test whether the

22 TGWG guidance document is good the way it is or whether

23 it needs to be strengthened? Do you want to test that?

24   MR. WILSON: In the context that that

25 document -- that the vote on that is that it's a

1   non-regulatory guidance document. I mean, I think it

2   just needs to be clear so there isn't confusion down

3   the road about -- because everything else talks about

4   these guidance documents. We've already stated that

5   they have to be part and parcel to --

6   MR. CULLOO: Best practice guidance.

7   MR. WEST: I have one comment. If it

8   was all in the guidance document, it seems like it

9   would -- since the if you will the risk phase area is

10   in the standards, would those need to be pulled down

11   out of the standards into the guidance as sort of a

12   framework for the more detailed guidance that's

13   actually in the existing guidance documents?

14   It kind of flows together, and that would be

15   my only recommendation. Since you're identifying the

16   risks and the standards, it seems like you'd want to

17   publish those in the guidance document.

18   MR. FISHER: Daniel.

19   MR. McGHEE: I just want to put it out

20   there that I'm getting mixed messages, because it's

21   like we're going to delete a promotion section but

22   then, no, let's not do guidance documents. Those

23   almost end up being a regulation or something.

24   So we vote not to do a bulletin or guidance

25   document on that section, and then we come to this

1   section and delete it, and then we say, yes, let's do a

2   guidance document. It's like what do we want?

3   One minute we feel this way.

4   If you delete promotion, you think it's a risk

5   but not in this jurisdiction but it's important, we

6   should have a bulletin, and then we vote not to have a

7   bulletin, and then the next day we do the same thing.

8   MS. TAHDOOAHNIPPAH: I think we should

9   treat them all the same way. If we do this, we need to

10   backtrack it --

11   MR. WILSON: I agree. I think we've

12   evolved, and I think we've realized from yesterday to

13   today that there is value to this, and I just think

14   we've evolved. I agree with Leo that that we should

15   treat it all the same when we run into these issues,

16   which hence goes back to my recommendation that for

17   those things that we find are a sovereignty issue that

18   we agree that they be handled in this manner, in this

19   guidance or best practice manner. If we have to go

20   back and revisit promotions to go on record to make

21   that statement, then we probably should.

22   MR. FISHER: What do you think of that,

23   Daniel?

24   MR. McGHEE: Yes. I agree.

25   MR. FISHER: What do other people think?

1 I just need to get some sense. The suggestion is to

2 treat them the same, which is in part -- part of the

3 evolution has been the acknowledgment that it presents

4 a sovereignty issue, there's an authority issue, and

5 that as I typed up on the screen there that it's a

6 suggestion for non-regulatory approach. That's what

7 I'm hearing.

8   That's different than what we talked about

9 yesterday, because one of the reasons why people didn't

10 support -- I can go back and show you -- guidance on

11 promotions was because of the potential for it to move

12 into a regulatory -- take on a regulatory character if

13 you will or become part of the regulations.

14   If anybody disagrees with treating them

15 similarly, each of those -- any section that we have

16 for sovereignty reasons or authority reasons suggested

17 or recommended that it not be included, that we treat

18 all those areas the same with respect to best practices

19 and guidance, if you disagree with that, I need you to

20 say so now so that we can figure out whether we're all

21 in alignment to move forward with that or whether

22 there's anything more we need to do before we move

23 forward. If you disagree with that, please say so now.

24   Nobody disagreed. This means -- how would you

25 like -- do you want to flesh this out as a group what

1 these would look like or in what way you're going to

2 build on or strengthen what the TGWG has proposed or

3 would you like to ask some folks to do that?

4   MR. MORGAN: Before we get to that, what

5 I heard from Rest was kind of go to general best

6 practices. Make should I understood the rest. You had

7 concern that the guidance documents in becoming a best

8 practices document may not be able to stand by itself

9 without something --

10   MR. WEST: I think it might, but if

11 you're providing information and guidance to a tribe,

12 it would seem like you would want to identify the risk

13 that you've identified in the standards.

14   MR. MORGAN: If we're going to get

15 uniformity in how we present that document, that may be

16 something within that document that you do identify the

17 risk or the concern you have, and this is best

18 practices of how you address that concern. Is that

19 your issue?

20   MR. WEST: I just think since they're

21 combined, to only present one part of it may not be as

22 informative as you'd want it to be.

23   MR. WILSON: As I see it, in the

24 standard for player tracking or promotions, there are

25 some things that are identified as must haves as part

1   of if it were a regulation, so to the same extent that

2   in guidance those components should not be included in

3   the guidance document, because they tie part of the

4   rationale of why you have all this guidance, and

5   without identifying that you should have these

6   components, that should be an inherent part of the best

7   practice document, because they are part and parcel to

8   one another.

9   MR. MORGAN: I did understand where he

10 was going. My point was to try to lead him to the

11 conclusion to make sure that the group understood that

12 just because you don't have the standard doesn't mean

13 you can't have the best practices, and because now

14 we've shifted our thought process and the purpose of

15 the document is a little bit different, there's a way

16 to incorporate those concerns into a best practices

17 document. I understood where he was going. I just

18 wanted to make sure we were on the same page.

19   MR. FISHER: Brian.

20   MR. CALLAGHAN: When we first started,

21 one of the thoughts I had and still have is that this

22 is great for what we're doing because we have a defined

23 purpose, but I also thought and respectfully suggest

24 that the NIGC convene another TAC of directors of

25 internal audit or you could still have Kathy there and

1   others to discuss best practices and minimum internal

2   controls, and then maybe you could come up with a

3   document based on that.

4   We're charged with taking a look at a little

5   bit of a different level of things rather than getting

6   it down into should, shall, how many people does it

7   take to do a drop? I thought it may be beneficial to

8   the NIGC as well to convene a group of directors of

9   internal audit and maybe come up with some kind of a

10   white paper based on that.

11   MR. FISHER: You'll take that under

12   advisement?

13   MR. LITTLE: Absolutely.

14   MR. FISHER: Do you want to do the work

15   in the whole group or do you want to task a smaller

16   group to come back with recommendations to the whole

17   group?

18   MR. LITTLE: Would that be today? Dan's

19   leaving at 10:00. You could task him with that.

20   MR. CULLOO: Personally, I'd like the

21   opportunity to go back to my facility and think about

22   this and talk to some of my staff and say, look, what

23   are your suggestions? It's at the local level it's got

24   to succeed.

25   MR. FISHER: We could task a small group

1   to serve as a coordinator in essence to gather that

2   information from the rest of the members of the

3   committee and present something back. Dan, are you

4   volunteering?

5   MR. McGHEE: No. I was just thinking

6   that we want to discuss the bingo guidelines, so maybe

7   because we've been going around in circles I suggest we

8   go to something that we know exactly what we want to do

9   with it, and this whole issue that the agenda committee

10   can decide when would be the best time to address that

11   at a future time.

12   I think we've established the core part of it

13   that when it was voted on that guidance documents begun

14   and that we recommended that it not be included in the

15   reg. Anything else, maybe we could leave that up to

16   the agenda planning committee how to address that.

17   As long as we're not going back to the

18   regulation, I'm all good and we're just talking about

19   guidance documentation, because I was here for that,

20   but I'd at least like to get into that.

21   MR. FISHER: Let's see if I can do this,

22   because at some point or another we got to do this.

23   Who is willing to work on this off-line?

24   MR. McGHEE: This is a more detailed

25   document of what we already have? Is that what they're

1   asking to do?

2   MR. FISHER: Yeah.

3   MR. McGHEE: Taking the NIGC's comments.

4   MR. FISHER: Change it and bring back a

5   proposal to the group. There's Jeff and Christina.

6   That's enough for right now. Then we can figure out

7   how to do it. Thanks for volunteering. I appreciate

8   it.

9   Why don't we -- I know we went around and

10 around a little bit. We've changed some things that we

11 did yesterday. We're about to embark on a new

12 direction with some of these things, and we want to

13 talk about the bingo guidance before Daniel has to

14 leave. It's time to move there. Before we do that,

15 why don't we take a short break, short meaning by my

16 clock we're going to start up again at 9:30.

17   (Recess taken.)

18   MR. FISHER: I wrote up on the screen

19 here on the next line an action item around doing the

20 best practices guidance, and after everybody

21 volunteered, Daniel also said he would work, and so

22 that will get going. Why don't we now turn our

23 attention to the bingo guidance.

24   MR. LITTLE: I think at the last meeting

25 we went over this, but I think it was decided that you

1   only want to talk about the standard and not the

2   guidance, and I appreciate you all indulging us to kind

3   of go back and not talk about the guidance. I think

4   we're working off the comparison document that we

5   provided you at the last meeting just so that we're

6   pretty clear. I hope everybody still has it.

7   MR. FISHER: I guess I could put it up

8   on the screen too.

9   MR. WHEATLEY: Please.

10   MR. LITTLE: I think what our interest

11 in talking about the guidance is kind of an overall

12 kind of philosophy on this particular section. I'm

13 going to let Rest kind of expand on it a little bit

14 more. Some generalized questions are -- hopefully you

15 can help us understand. I'm going to let Rest.

16   MR. WEST: This is my opinion as far as

17 the standards themselves that basically grew out of the

18 original MICS standards which were developed basically

19 to cover paper bingo.

20   The standard and the guidance documents as far

21 as the codes by NIGC are not basically any different

22 than those that are in the Federal Register right now

23 that were supposed to go into effect. Now they've been

24 postponed to October of 2012.

25   My concern is how does the small gaming

1   operation or how does the gaming operation represented

2   here if you're purely a class 2 facility, you have

3   electronic bingo machines or electronic bingo player

4   terminals, whatever the nomenclature is, how do you

5   take the standards and the guidance developed by the

6   TGWG and develop adequate control procedures for

7   electronic gaming?

8   I haven't looked at the checklist developed by

9   the TAC. I don't know if they segregate the paper and

10   electronic, the differences between the two. It's

11   always been an issue with the tribes that are in class

12   2 or have adopted -- even the ones that have adopted

13   the 543.7. How do they comply with the standards if

14   they're purely operating electronic bingo player

15   terminals?

16   MR. McGHEE: What I found when we were

17   looking through this, because we do have class 2, is a

18   lot of the things that are asking to be done in the

19   bingo section, whether it be paper bingo or electronic

20   bingo, is still a requirement. It's just that now you

21   rely on the electronic that -- the player interface or

22   the server is doing a lot of what you may have manually

23   done before.

24   So when I read through it, I would say, well,

25   it's saying that bingo is asking for this, and then I

1   would say, well, our system does that, so I'd meet that

2   requirement.

3   Then any other thing that we're used to --

4   kind of the crossover is covered in the server section,

5   you know. Not the server section. What is it called?

6   I forget the new section. Service systems and

7   something. It's covered there, because I have now

8   incorporated a system or server into my bingo game

9   play, so I use that section and this bingo section and

10   still comply.

11   So a lot of what's here as I was going through

12   it that asks to be done is done. It's just now done

13   electronically. I can pull it up from a server or a

14   report or a log versus usually it was done this way.

15   So I wanted to be sure -- and I was helping

16   write some of the regs for this -- that there was

17   nothing here that would be, oh, well, I can or cannot

18   do that because it's paper and it says gaming, and to

19   the best of my determination, they crossed over just

20   fine.

21   MR. WEST: I have a different opinion.

22   I think it would be some of the operations that don't

23   have the expertise and having being working in class 2

24   so long -- I don't know if anybody else has looked into

25   the standards and see how they can develop adequate

1   internal control procedures for electronic bingo or

2   not. I think a lot of operations have difficulty

3   taking the 543.7 that's in the Federal Register and

4   developing adequate controls. I know we struggled with

5   543.7 to see what we determined was applicable to paper

6   bingo versus electronic bingo.

7   MR. McGHEE: With this one?

8   MR. WEST: The Federal Register.

9   MS. HAMEL: I think there's maybe --

10   being a completely class 2 facility is that the bingo

11   section on its own doesn't identify all the controls of

12   controlling bingo. So much of it is in the server

13   section and is pushed to accounting and auditing and to

14   drop and count.

15   So standing on its own, it may not look like

16   it covers all the controls, but those other controls do

17   encompass the full controls that the standards that

18   need to be set for controlling bingo.

19   MR. WEST: So have you developed

20   principles or procedures at your facility just for

21   electronic bingo?

22   MS. HAMEL: Uh-huh.

23   MR. WEST: And they would follow what

24   TGWG has recommended?

25   MS. HAMEL: Ours haven't been changed to

1   this particular format, but we still cover all of the

2   standards as recommended here.

3   MR. WEST: I think moving things to

4   different areas is also added to the complexity and the

5   concern that I have for a lot of the gaming operations'

6   ability to develop and determine what is necessary to

7   develop internal controls for electronic bingo versus

8   paper bingo.

9   MS. LASH: Maybe that's where the

10   checklist could become more helpful since we have

11   reorganized and moved things. You could have your

12   checklist of the areas and then direct through the

13   checklist the different sections where it is.

14   MR. FISHER: Matthew, then Tom.

15   MR. MORGAN: My comment has to come back

16   to I know you go back and you look at how bingo is

17   played, but when you talk about internal controls for

18   the game of bingo, it was defined in IGRA, so you're

19   working within that limitation first.

20   There's three things. Bingo, you have court

21   cases that back up there's only three elements of

22   bingo. When you start going to player terminals, some

23   are hand-held and session games and paper games, but

24   trying to develop internal controls that meet all three

25   of those at a minimum level, that is difficult

1   sometimes, because, again, you have to encompass all

2   three of those type of activities in bingo.

3   I think Kathy was right in that, you know, for

4   the gaming section, if you're just talking about

5   electronic player terminal bingo, you know, you do have

6   to look at accounting, drop and count, some of the

7   other sections incorporated with that that goes along

8   with a player terminal, because after you get outside

9   those three elements of bingo, you get into a

10 conversation of a technological aid. This aids in your

11 play. You don't have to use it, but it's an aid.

12   How you deal with those aids to bingo, you

13 know, is trying to look at technological invasions

14 while at the same time not leaving anything in the past

15 behind that you once did, because anything you can do

16 at an electronic player terminal fundamentally you did

17 in a paper bingo game.

18   Sometimes that can be a little difficult,

19 complex if you're looking at how many operations you

20 run, because a lot of operations these days don't run

21 paper bingo sessions today. You look at it and you say

22 could you do that in a paper bingo game?

23   The answer is yes. You do it by some other

24 means. That's the reason you do incorporate some of

25 these sections into -- you don't read it in a vacuum by

1   itself. You have to read the document in its entirety.

2   MR. McGHEE: A lot of it is the main

3   addition to this bingo section was the technological

4   aids to play bingo. You say what are the main

5   properties of bingo that need to be controlled, and you

6   label those out and say controls need to be in place

7   for those.

8   Then when you get into the actual guidance

9   document where it talks about technological aids, then

10   it talks about issues with shipping and receiving and

11   then issues with access credentials and recordkeeping

12   and audit processes for electronic gaming, testing.

13   There's a whole area devoted just to when it

14   becomes electronic, because at the end of the day,

15   bingo is bingo. The process is bingo. Then when you

16   add electronics to it, then you have to start thinking

17   about that, which is why the technological aids section

18   of the guide talks about that. It goes into what added

19   risks are now there because you have technological

20   aids? Whether it's done adequately or not, it's

21   addressed in here.

22   MR. WILSON: I would tend to agree with

23   Rest that one of the problems that I see fundamentally

24   with the format of the TGWG document is that it lacks

25   maybe a sufficient amount of cross-referencing, because

1 what I see could occur, and I think what you're

2 speaking to is that somebody turns to the section on

3 bingo and the assumption is that everybody's going to

4 read this document in totality in order to conclude

5 upon whether their controls -- that they've covered all

6 the controls.

7   What your documents do is every transaction

8 has a life cycle cradle to grave, so theoretically the

9 entire document covers the life cycle of these various

10 gaming activities and things, but I think that there

11 needs to be a clear one-to-one relationship in order to

12 capture that entire life cycle to ensure that you have

13 adopted all of the controls, because as you pointed

14 out, it's not just the game.

15   You know, you've got an accounting aspect to

16 it. You've got all these various aspects that there

17 needs to be a good tie to lead the reader to understand

18 that this isn't everything in this piece but you've got

19 to refer and make sure that you have included all these

20 other components in order to have a complete control

21 structure of the life cycle.

22   MR. MORGAN: 543.3, system of internal

23 controls, when you're setting up something, you don't

24 go in and just look at bingo, not when you're setting

25 it up. You look at what is required for the totality

1   of the system. That's why 543 says you have to adopt

2   internal control standards to cover the areas that are

3   covered in this part, all the parts. That is the

4   point.

5   So when you go into a specific subject matter,

6   you're reading on that subject matter, but you can't

7   read it without looking at that 543.3 document. Again,

8   that's the reason we stress. That is so important when

9   you read that first part. People actually gloss over

10 it and go right to the subject matter. That is why we

11 put in there a system of internal controls to cover.

12   Fundamentally class 2 is that you can't have a

13 player terminal. It is a system. It has to be linked.

14 You have to have player participation. If you don't

15 have a system, you don't have class 2.

16   Early on we get into downloadable.

17 Downloadable is a new big thing in class 3. It was

18 already set up with a player. You know, you put money

19 in. It goes back to the server. You have a game

20 server. You have a money server. You have servers in

21 the back. It's always been a system when you run a

22 class 2 electronic player terminal.

23   It's always been that way. If you go in to

24 look at historically how you did it, this is not a new

25 concept. This was the concept. If you just go back

1   and read that 543.3, that point of reference you're

2   looking at, that is what sets you off and you

3   understand you do have that system of internal controls

4   for no matter what you do. If that's cards or bingo,

5   pull tabs, whatever gaming actives you decide to take

6   up, it does include that.

7   MR. WILSON: Just to follow up on that,

8   I'm not stating that it doesn't state that. What I'm

9   saying is that -- and we see this in our organization

10 with our comment packet and various things. We have a

11 compact, and we've got four or five appendices to the

12 compact, and there is no clear reference that this item

13 is talked about here but it's also talked about over

14 here, and if you don't read the over here part, you're

15 going to miss something.

16   All I'm suggesting is that human nature, as

17 you just said, people often gloss over that first part,

18 so I'm merely stating that to the extent that you can

19 minimize human nature in glossing over that first part

20 and ensure throughout the document that there's a clear

21 tie between all the components that you need would be

22 beneficial to the document format that it's in now

23 being more successful.

24   MR. LITTLE: I know we talked about this

25 a number of times. I think getting back to Rest's

1   original point about -- I know the underlying goal or

2   the concept of this was to organize things in a better

3   fashion to make them easier, you know, for -- you know,

4   to follow a grouping type of things so there's some

5   continuity.

6   But I think one of the issues that Rest had

7   raised is that, you know, we have to create standards

8   and regulations that encompass the entire industry, and

9   I think what we're looking at is how do we ensure that,

10 you know, facilities from varying levels of maturity

11 are able to comply with this and not miss anything like

12 Tom was saying there?

13   Maybe like he was saying there needs to be a

14 better effort on references. In this one here, the

15 only reference is to the accounting section, but there

16 are some areas that probably it would be helpful. I

17 don't know if that's something that could be looked at

18 again or if there's any way to beef it up.

19   MR. MORGAN: I will say going to your

20 point, Tom, there was always discussion with redundancy

21 in there, and one of the reasons we thought the MICS as

22 written right now are so thick is, one, you have a lot

23 of procedures in there, and, two, there's a lot of

24 redundancy in there. When you look at it operationally

25 or regulatorily and you tell your staff go read this

1   and you bring a document like this, they drop their

2   head and go, oh, my goodness. Whether we covered the

3   subjects adequately and are there places where you need

4   to be redundant was a question that came up several

5   times.

6   We did try to put in points of reference. On

7   this one, internal controls was very big in our mind

8   that, hey, we're putting out a cue here that says you

9   need more than just this subject matter, because

10   otherwise if you go into pull tabs, within the pull

11   tabs section, are you going to list out every subject

12   you need to operate a pull tab or are you going to

13   organize it the way that we decided to organize it was

14   you organize it by subject matter with some type of

15   pointers?

16   We're looking around the table saying is it

17   clear enough to you, to you, to you? We may have got

18   their concerns in, but we may have missed somebody,

19   because, again, it wasn't a national -- everybody

20   wasn't included just because of how the effort was

21   placed.

22   That could be a concern here, because

23   sometimes we were overly redundant sometimes, because

24   we wanted to stress the point. That may be a concern.

25   MR. WILSON: I'm not advocating

1   redundancy. I'm just advocating pointers to move

2   people to ensure that they know. I'm trying to

3   eliminate all of the human aspects of things that we

4   all deal with every day, and that's people not knowing,

5   you know.

6   So to the extent -- I mean, what I envision in

7   my mind not in the document, but if I were, let's say,

8   going to be training my folks on this document, I would

9   show the life cycle of this, envision a flow chart, and

10 here's what this transaction does, and here's all the

11 different things that it touches to where ultimately

12 that's why you have to have these controls in these

13 different areas, and I think that the document does

14 that.

15   I would just want to make sure that for those

16 areas or those tribes even that don't have the level of

17 sophistication perhaps to get to that point that there

18 are clear pointers that ensure to the best possible way

19 that they can get there.

20   MR. FISHER: We got Daniel and then

21 Matthew.

22   MR. McGHEE: I see your point, but I

23 guess I'm missing what you're saying is actually

24 lacking, because nowhere would you really need to

25 point, because you don't point to a section and the

1   other section.

2   It's relevant that if you're dealing with

3   money and bingo that you're going to have to -- if

4   you're dealing with a system that you're going to have

5   to consult the IT section. It's inherent. I don't see

6   any less or more pointers in this section than I do in

7   any other section that you have to refer to the same

8   things for.

9   The process or life cycle going through here,

10   unless someone could point them out, then I would be

11   better off that are here. You know what I mean?

12   Because it's a gaming system or it has a drop box,

13   there's going to be a drop. Why do we have to put in

14   here please refer to the drop when it may not be in the

15   other section we need to refer to a drop because it's

16   common knowledge.

17   People dealing with bingo are no less familiar

18   than people dealing with card games. I don't think we

19   have to completely spell it out in here just because

20   it's bingo.

21   MR. FISHER: I don't know which one of

22   the two of you got there first.

23   MS. HAMEL: I have a suggestion. When

24   the TGWG worked on these individual regulations, we saw

25   as we went on that there was what we call boilerplate

1   language that we eventually went back to each section

2   and entered. An example would be internal control

3   procedures, computer application variances, and

4   supervision.

5   Does there need to be a fourth -- a fifth

6   boilerplate that says that it's each operation's

7   responsibility to check if we're in bingo, patron

8   deposit accounts, cage involved, lines of credit,

9   security -- I mean, is that enough direction in the

10 introduction of the regulation rather than

11 regurgitating the same information as part of the

12 boilerplate? The fifth thing you have to do is go

13 check those other sections and comply.

14   MR. CULLOO: That's a really good idea.

15   MS. HAMEL: It could be a fifth

16 boilerplate. That's everyone's responsibility to check

17 surveillance, drop account, auditing and accounting,

18 complimentary, service security.

19   MR. LITTLE: Would that reach your goal

20 of trying to simplify this for a regulator where I

21 think currently it's basically in a reg, you read it,

22 where now you're flipping back and forth?

23   MR. McGHEE: Because the cage like I

24 said reflects certain things.

25   MR. FISHER: Go ahead, Kathy.

1   MS. HAMEL: It's only 30 pages long.

2   Somebody could read it in an hour.

3   MR. LITTLE: The standard is. However,

4   the guidance won't be. There will be -- it will be a

5   pretty sizable document. Then that will have to be

6   whether or not the TGRA adopts that guidance into their

7   own guidance, so it will be -- I think it's going to be

8   a lot more complex than just a 30-page document.

9   MR. McGHEE: You need somebody to

10 identify maybe where that cross-reference is lacking in

11 the guidance document to help me understand maybe what

12 the real issue is. I know we're talking about the

13 concept of it, but I haven't seen any details of this

14 is lacking this. You know what I mean?

15   MR. MORGAN: Two things. I keep

16 wondering is it good enough or is it clear enough,

17 which is a very subjective standard that slides back

18 and forth depending on your experience or maybe your

19 operations, so whether it's clear enough is sometimes

20 hard to pinpoint. That's where other training,

21 technical aspects, networking will be relied upon.

22   My worry there sometimes is when you start

23 putting in references is how do I read the document?

24 Do I read that document saying you put in every

25 reference so that document is all encompassing and what

1   if you missed one? Is it not required at that point to

2   go look?

3   Two, I keep going back to that how system of

4   internal controls is defined. When you start talking

5   about overall operational framework for gaming

6   operations, it uses some of the language that you're

7   concerned about, and that's that thought, the idea

8   behind that system of internal controls document that,

9   you know, after you have your MICS and you have your --

10   you still have to go down and get into your policies

11   and procedures. That's exactly how you carry that out.

12   It needs to be more detail.

13   MS. HAMEL: It's far more detailed than

14   the guides document.

15   MR. FISHER: It might be useful to

16   acknowledge that Daniel is going to leave us right now.

17   MR. LITTLE: I do appreciate the goal of

18   trying to streamline this. I'm not trying to -- I'm

19   just trying to be maybe asking pointed questions. I

20   know the effort, and I really respect it, and I know

21   you guys did a good job at trying to organize it so it

22   is clear and that everything flows and there's no -- we

23   even came across where you've got the same item written

24   differently in two different sections. So I do

25   understand that. Please don't take my comments as --

1   MS. HAMEL: No.

2   MR. FISHER: It's also that partly their

3   reading it, people who worked on it all that time have

4   a better appreciation for what it is you were trying to

5   accomplish and how all the pieces fit together, and now

6   you're getting people who are reading it kind of cold

7   and looking at the whole thing and asking these kind of

8   questions.

9   MR. WILSON: This brings up an

10   interesting point, because something that Brian

11   mentioned yesterday. See, to me, the true test of any

12   of this is you put it in use and you see what all

13   doesn't work, because when you sit in a room and you

14   conceptualize, it all makes perfect sense, but

15   oftentimes when it's implemented it does not go the way

16   that everybody envisioned simply because somebody

17   interpreted this, somebody did this, or somebody didn't

18   know.

19   This concept of a pilot program, when you're

20   talking about a different way of approaching that is

21   intended to be more efficient, more effective, it seems

22   to me that a pilot program to help work out some of the

23   bugs if you will or a beta test would be beneficial,

24   because at the end of the day, what I don't want is

25   something that ends up getting published that then

1   afterwards we're all saying, well, how come and what

2   about this and why wasn't this considered or that but

3   then we're stuck with it at that point because it's a

4   regulation now.

5   If there is some way to pilot test before as

6   part of the something, the process, that would be

7   great, because I can tell you that sitting in a room

8   and going through this document, I can't tell you that

9   the concept that is hoped to be achieved can actually

10   work the way that you're anticipating until it's tried.

11   MR. MORGAN: I will tell you that at my

12   place when you did publish the 2008, we tried to be

13   proactive and adopted and tried to marry 542 and 543

14   together. The issue that we ran into we're not

15   operating under 542 or 543. It was trying to make 543

16   line up with 542, so, okay, I'm doing it correctly

17   under 543, but now I'm out of compliance with 542.

18   That was our -- the conflict between those two

19   standards was the area that we had the most trouble

20   with.

21   Me saying that, we have 5,000 plus electronic

22   terminals. We have two session bingo games, and at my

23   place they tell me I don't have challenges. I've had

24   lots of opportunities for trial and error, so I'm not

25   in a position that Rest is looking at for a new gaming

1   operation. We're in a little bit different position.

2   This did work in the guidance and helped us

3   develop something there. My issue was reading it to

4   make sure that on the board because I have class 2 and

5   class 3 electronic games, making sure that I met both

6   standards. That's where my trouble came in.

7   MR. FISHER: Did you have other

8   questions or comments?

9   MR. WEST: I want to reiterate that to

10 me the standards are based on and did an adequate job

11 in the past of providing controls for the standard for

12 paper bingo, and I think they've kind of been massaged

13 and a few things have been added by the committee back

14 in 2007 or 2008, whenever it was; that basically what's

15 published in the Federal Register, also what is

16 basically in proposed draft on the website, I don't see

17 any significant changes between the two documents.

18   So, again, I have trouble seeing how an

19 operation with not a good background, I guess, in class

20 2 gaming or maybe not the level of expertise could

21 develop adequate internal control procedures can take

22 even a 543.7 documents in the Federal Register or the

23 TGWG document and do a good job of safeguarding their

24 revenue stream.

25   MR. CULLOO: My experience, Rest, you

1   keep going back to inexperienced organizations or

2   start-ups. When I start up -- when I was TGWG

3   director, I had nothing to go by except documents with

4   this and with the state. Invariably what I'd do is go

5   to other organizations and ask counterparts. Hey, I

6   don't really follow this somewhere. Could you kind of

7   explain to me how this works, kind of how it flows?

8   I think invariably most people, I would think,

9   if they can't grasp concepts, they're going to seek

10   advice. Now, granted there will be some that won't,

11   but you can't help everyone that doesn't want to be

12   helped, and I think it's incumbent upon people when

13   they get to the point they got to develop a set of

14   controls that everyone I ever known that's been

15   involved in something new seeks advice from

16   counterparts that had experience in it.

17   A lot of what I got was internal controls from

18   my counterparts, and I adapted it to my specific

19   organization understanding the minimum controls I had

20   to meet and then take what they have and incorporate it

21   in. I don't think you can write a document that

22   everyone is going to comprehend. I just don't think

23   it's possible.

24   MR. WEST: I think you can provide

25   proper guidance, and I think there's a lot of

1   operations in my opinion that do not go outside CP

2   guidance. Whether they don't want to, the reasons for

3   that, they're all various and sundry.

4   To me, the purpose of this to me is to provide

5   the proper amount of information whether you're doing

6   paper bingo. Electronic bingo I think there's some

7   challenges. I don't know if the committee here have

8   taken these standards to sit down and see if they can

9   follow them and determine which standards and guidance

10   is appropriate for paper versus electronic. I don't

11   know if that's been done or not.

12   MR. FISHER: Tom. And then is that your

13   card up, Matthew?

14   MR. MORGAN: Yeah. I'm trying to stay

15   out of Tom's way.

16   MR. WILSON: I just want to touch upon

17   this concept, though, of regulating to the least -- the

18   lowest common denominator. The problem with that is

19   that if a tribe elects to get into gaming, inherently

20   there are certain things that they have to do, and if

21   they don't do those things, they need to, but it

22   shouldn't be incumbent upon another organization that

23   is doing the things that they're supposed to do -- I

24   mean, the issue in my mind becomes one of you have to

25   take responsibility for what comes with what you ask

1 for, and if you're going to get into gaming, then at

2 some point there's a personal responsibility that that

3 tribe has to take on to develop the systems of internal

4 controls that has to happen.

5   We went through this similar debate in the

6 SOCS(phonetic) world, which was, well, how is it that a

7 company like Boeing that can spend $80 million on

8 SOCS(phonetic) compliance but the mom and pop operation

9 that happens to be a public company doesn't have

10 $80 million to come into compliance.

11   So there does have to be, I think, this

12 balance of how does an entity like this achieve, and I

13 think that that's the whole safe harbor aspect, which

14 is, okay, if you can't figure it out, here is the safe

15 harbor that says, well, if you do this, because there

16 certainly are those tribes that probably need what I

17 would call the off-the-shelf solution to be able to do

18 that.

19   But to the extent that a tribe isn't owning up

20 to their responsibility to have internal controls, I

21 look at that as a different issue that regulation can't

22 address. I mean, that gets to that whole enforcement

23 side of you got to step up to the plate and meet this

24 minimum, and if a tribe isn't, I don't want to be

25 penalized through regulation to put something in place

1   to ensure that that tribe is meeting their

2   responsibilities.

3   MR. MORGAN: Rest, I mean, you've been

4   in the industry a long time. You've been working at

5   this a long time. If I hear your comments correctly,

6   you know, your statement was that the tribal gaming

7   work group document wasn't much different from the 2010

8   or the 2008 and that you thought it adequately covered

9   paper but maybe not electronics.

10   With your years of experience and with your

11   expertise you have in the agency, if you see some

12   weaknesses in the document, do you have suggestions in

13   areas where they're weak, because if you've seen this

14   time and time again, I know you want knowledge coming

15   this way, but I would like some knowledge coming this

16   way too, because clearly we saw some things in here we

17   thought we addressed, and if you're seeing weaknesses

18   somewhere, I really would like to hear where it is or

19   what you're seeing just for purposes of discussion and

20   dialogue.

21   MR. MAGEE: Maybe a subcommittee should

22   be formed with Rest to flesh out what the issues are

23   and come to some sort of agreement or guidance

24   document, because the risk of not doing that, we could

25   have NIGC developing what we fear would be regs that

1   would be not in the best interest of the industry.

2   That's my suggestion.

3   MR. MORGAN: That's a good question.

4   MS. HAMEL: I guess if it was so

5   lacking, why was it published before? I don't mean

6   that to be sarcastic, but...

7   MR. WEST: I don't know. You'd have to

8   ask the prior commission.

9   MR. MORGAN: I agree that that's useful

10   in the sense of how we operate too. We are cast with

11   getting documents coming, ready to discuss on bingo. I

12   don't feel like you all came prepared as much on bingo,

13   which is really a very important section.

14   I mean, we've had great discussion on other

15   subjects, but it seems like the most important subject

16   for class 2 -- I felt that way in South Dakota that,

17   you know, do you have concerns, where they're at, what

18   points do you want to hear? Maybe we just haven't got

19   into them far enough yet, but from my chair, I haven't

20   heard enough back on this subject.

21   I hear you have concerns, but I'm really not

22   for sure what those concerns are or where those

23   weaknesses are specifically even conceptually

24   specifically that we can talk about, because bingo

25   really is a large concern, you know. If we don't get

1   bingo right here, we can do some serious damage to the

2   industry.

3   MR. FISHER: I don't know if this fits

4   with what you're asking for, Matthew, but when I look

5   at what's on the screen and the bingo section in terms

6   of the NIGC comments on the guidance documents, there

7   are some very specific comments in there, and so I

8   don't know if it would be useful to go through each of

9   those comments in the bingo section like we've done for

10 other sections or whether there are some specific

11 things that it would be more useful to focus on.

12   Why don't we take -- maybe we should take a

13 short break right now. Let NIGC confer. Give people a

14 chance to check out who want to check out, and then

15 reconvene in about 15 minutes.

16   (Recess taken.)

17   MR. FISHER: When we paused, we were at

18 the point of --

19   MR. LITTLE: Talking about bingo. Rest

20 has another item that he would like to talk about, but

21 I think what we struggle -- we're understanding the

22 whole concept that Matthew and Kathy has helped expand

23 upon this being an entire system.

24   What I think would be helpful for us is Rest

25 wants to talk on one specific subject, but it would be

1 helpful to us if we maybe raise this issue, maybe table

2 it until after we go through the remaining sections,

3 because we have reference to guidance, and it had been

4 a very difficult time to compare these documents.

5   Mike and his staff and audits with Rest and

6 his staff, this has been a large group operation, and

7 trying to find where there's adequate references and --

8 because some of the components have been moved have

9 been addressed in the accounting section and patron

10 deposit accounts, so there's different areas.

11   It would be helpful for us if let's go through

12 those sections first, and then we will ask that we

13 maybe revisit this again, and in the meantime, we'll go

14 through it, and we heard from a couple folks that you

15 guys would like specific areas where we feel that there

16 could be components that were overlooked or other areas

17 that could be beefed up or maybe even just the

18 opposite. I think we did touch upon some of the

19 controls for handling pay-outs that we thought maybe

20 were a little too strict in the guidance.

21   I think that's what we were asking if you can

22 maybe move on or table this after Rest talks about the

23 one item he wants to talk about and then revisit it

24 after we go through the remaining sections.

25   MS. LASH: And this is something

1   separate, but to keep in mind while we're moving

2   forward with this process, I want to make it really

3   clear to the TAC and to the NIGC the checklists that

4   were sent in were not a work product endorsed by the

5   Tribal Gaming Work Group. There were some

6   subcommittees that were trying to attempt checklists to

7   begin the process. I've not seen them. I don't know

8   if Matt's seen them.

9   We cannot say that this is a Tribal Gaming

10   Work Group document, because it is not. It was just a

11   starting point that a subcommittee made an attempt to

12   begin. None of us have seen them or worked on them or

13   reviewed them or approved them.

14   So really I think it's better that your group

15   as you go through the document make your own

16   checklists, and that's what Rest is familiar with doing

17   with his compliance position, so I think it's safer

18   that you rely on your own checklists and not those.

19   MR. FISHER: Rest.

20   MR. WEST: Just a couple things that

21   have been kind of dropped. This is not meant to be

22   comprehensive of everything that I cannot locate at

23   this time. The voucher system section, was that moved

24   from bingo to where?

25   MR. FISHER: Who can answer that for the

1   TGWG?

2   MR. MORGAN: I think Daniel could.

3   MR. WHEATLEY: You don't want to answer

4   for him?

5   MR. FISHER: No. He gave back the card.

6   MR. CULLOO: Too much responsibility.

7   MR. WEST: It says here that they were

8   covered in 543.14 in this document.

9   MR. LITTLE: What we'll do is we'll go

10   through these and basically go through the bingo the

11   areas where we identify that something has been

12   dropped. We'll go look and make the reference and then

13   go into the other section and look at it and make

14   comments.

15   MR. FISHER: From a systems approach,

16   right? So figuring out how all the pieces fit

17   together?

18   MR. LITTLE: Exactly.

19   MR. WEST: Another point, is statistical

20   analysis a game performance for bingo? I don't see

21   where it ended up in the TGWG document or guidance.

22   MR. FISHER: Statistical analysis for?

23   MR. WEST: Game performance. It's an

24   important control and management tool.

25   MR. FISHER: Where is it in your

1   existing regulation?

2   MR. WEST: It's under accounting in the

3   document. I6.

4   MR. LITTLE: No. He's looking at the

5   2008, right?

6   MR. FISHER: Shouldn't there be a

7   cross-reference in the TGWG document about where that

8   went?

9   MR. WILSON: What document are we

10   referencing?

11   MR. WEST: It's a general question. Is

12   there any guidance or standards in the TGWG documents

13   related to statistical analysis of gaming performance

14   for bingo?

15   MR. MORGAN: I don't remember sitting

16   here today if there's anything. I can tell you some of

17   the discussion around, you know, when we talk about

18   conflicts between 542 and 543 on the statistical

19   analysis of game performance and how you determine your

20   actual and how that relates to theoretical class 3

21   stand-alone machine is so much different on a bingo

22   basis, and that's one of the inherent conflicts that we

23   got into. I don't remember how we addressed it or if

24   they decided to leave it out.

25   Going back to that difference, that is always

1   one of our issues for a class 2 electronic machine,

2   because you can't sit down at a player terminal and say

3   what is your actual versus theoretical on this machine,

4   because it's not -- it's a game. How many machines is

5   that game played on? Where in the cycle are you on

6   that game?

7   It has lots of impact on it, and maybe people

8   in operations could talk to the usefulness of it, but I

9   could look back through it and call some people and ask

10 them to better clarify that, because I do remember we

11 had large discussions around statistical analysis and

12 its usefulness. I just don't recall if we put it

13 somewhere else or if we deleted it entirely.

14   MS. LASH: I think we could revisit that

15 obviously not today, but if you give us the points, we

16 can revisit with the group and come back with better

17 answers.

18   MR. WEST: There's a section in the

19 proposed and also the published document on statistical

20 reporting. Honestly, I'm not very happy with the way

21 it was developed in here, but I think that the concept

22 of statistical reporting is very important.

23   MR. WILSON: Are you looking at the

24 accounting section, item 4, where it talks about a

25 monthly audit to include 3 percent variance? Is that

1   what you're referencing?

2   MR. WEST: I'm referencing the section

3   actually which was probably the starting point for the

4   TGWG. It's not this document, but it's identical to

5   this document, I would think, that's being proposed,

6   the 2010 draft. If it isn't, it should be in there.

7   MR. LITTLE: I don't think everybody's

8   got a copy of the 2008 regulation that's been

9   postponed. 2008 had been postponed, and then we've got

10 a 2010 draft that's on our website, but that's never

11 been published or proposed. It's just a draft on the

12 website.

13   MR. FISHER: So there's follow-up that

14 needs to be done there. Rest, did you have anything

15 else?

16   MR. WEST: No.

17   MS. HAMEL: Rest, in 2010, was it in

18 bingo or --

19   MR. LITTLE: So I'm clear, it's the 2010

20 draft. It's not a proposal.

21   MR. MORGAN: Where is it located in that

22 document?

23   MR. FISHER: We could look.

24   MR. LITTLE: Can you get on our website?

25   MR. FISHER: Sure.

 1   MR. WEST: On the 2010 document, it was

 2   moved to the accounting and audit of 543.50, and it's

 3   listed as performance analysis.

 4   MR. WILSON: Did you say 50 or 15?

 5   MR. WEST: 50. It's just something to

 6   put on the table for the next meeting, I guess.

 7   MR. WILSON: Just for my own

 8   clarification, there's two pieces to this comment,

 9   then. One is that the section 543.50, which is titled

10   revenue audit, in there it talks about some of this

11   analysis that should be taking place, but that is

12   lacking in totality in the TGWG document, and then the

13   second part is that what is in the 2010 document in

14   your opinion is probably not sufficient anyhow?

15   MR. WEST: Correct. It could be in the

16   TGWG document. I just haven't found it. I'm not

17   saying it's not in there.

18   MR. FISHER: What's the subsection?

19   MR. WEST: Statistical performance.

20   That's where it was.

21   MR. FISHER: There's nothing in there

22   about statistical performance. Statistical reporting,

23   is that what you're talking about, Rest?

24   MR. WEST: Yeah.

25   MS. TAHDOOAHNIPPAH: It's in the

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 1   guidance documents for accounting on page 10.
 2                   MR. FISHER:  Tab L in the notebook, page
 3   10, section 43I.
 4                   MR. WILSON:  That's the same one we
 5   talked about yesterday.
 6                   MR. FISHER:  Right.
 7                   MR. WEST:  I think this gets back to
 8   trying to cross-reference where the accounting and
 9   auditing sections are.
10                   MS. TAHDOOAHNIPPAH:  And this goes back
11   to the pull tabs and card games.
12                   MR. LITTLE:  Do we need to look at the
13   guidance documents here to see if that's sufficient?
14                   MR. WEST:  The bingo?
15                   MR. LITTLE:  No.  The accounting.
16                   MR. WEST:  I think it's probably lacking
17   in both documents.  I'm just putting it on the table
18   for the members of the committee to look at to see if
19   the guidance or the standards need to be expanded.
20                   MR. WILSON:  Rest, the problem I have
21   with saying that it's lacking, again, we're not getting
22   -- obviously it was submitted and the working group
23   thinks that it meets it, so I'm just having difficulty
24   if you look at it without more feedback about what
25   specific --
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1   MR. LITTLE: This is one of the items

2   we'll cover. We'll address this before the next

3   meeting.

4   MS. TAHDOOAHNIPPAH: It might be

5   lacking, but how effective is it the way it is now?

6   You're not just looking at that one machine, so how do

7   you effectively analyze it?

8   MR. FISHER: Anything more we need to do

9   on bingo right at this point?

10   MR. WEST: No.

11   MR. LITTLE: We're good. Thank you.

12   Anybody else?

13   MR. FISHER: Anybody else have anything

14   else on bingo, the bingo guidance you want to bring up?

15   I did make a note on the action item list that we would

16   revisit the bingo guidance after we've looked at the

17   other sections. Is there more we need to do that we

18   can do right now on the MICS on 543 or have we worked

19   our way through all that for now and we should turn our

20   attention to moving into closing out?

21   MR. WILSON: Are we going to have a

22   public comment?

23   MR. FISHER: Yes. I don't know of

24   anything more that we can do on the MICS right now, so

25   if anybody has anything else to bring up, please do so.

1   So we're obviously way ahead of schedule, and so do you

2   want to do the public comment -- create the opportunity

3   for public comment before we do our housekeeping and

4   kind of closing session? Yes?

5   Why don't we do our opportunity for public

6   comment right now, so this is an invitation for anyone

7   in the audience who would like to present direct public

8   comment to the committee to do so now. Step forward.

9   Do you want a microphone, Sheila?

10   SHEILA: I don't know. Can you hear me?

11   I've never been accused of needing a microphone. I'm

12   from Oklahoma Gaming Association. I just want to let

13   you know that the transcripts for Rapid City are back.

14   We will post them -- NIGC will post them on Monday.

15   Would you like me to send you each individual copies or

16   would you just like to pull them off NIGC's website?

17   MS. LASH: I think we discussed that

18   issue the last meeting, and we're supposed to get our

19   information from them.

20   SHEILA: That's fine. For those people

21   who want to go to OIGA's website, it will also be

22   posted on there, so multiple places for you to get it.

23   MR. FISHER: Thank you. Anyone else

24   wish to provide public comment to the committee?

25   MR. GREEN: Yes.

1   MR. FISHER: We pushed that up on our

2   schedule, so now would be the time.

3   MR. GREEN: I apologize for stepping

4   out. I had a phone call from another one of my

5   keepers. That's what they refer to me most of the

6   time.

7   MR. FISHER: Can you tell us who you are

8   for the record?

9   MR. GREEN: My name is Jess Green. By

10   trade I am an attorney. I work for many tribes,

11   including two of the TAC members at this table. I am

12   in fact a qualified expert for one of the TAC members

13   at this table being an employee by trial resolution and

14   specific designation of their election. We have

15   furnished that and we had it ready, and I think we are

16   the only ones that have done that and I think the only

17   qualified expert that has made that kind of delivery.

18   What I would like to speak about is the NIGC

19   jurisdiction issue on player tracking. I'm often

20   brought to the table when everybody is at the table and

21   in a biased position, and one of the first things I do

22   that may be unusual is I step back about ten steps and

23   I walk around the table and try to see the issue that

24   is in front of everyone and try to see it from their

25   perspective, and that's a little different, but I like

1   to win when I have a confrontation, and if you don't

2   understand everyone's positions and all of the issues

3   and all of the risks, you can't understand how to have

4   a confrontation and prevail. Lots of times you have to

5   tell your client you can't win this. We need to find a

6   way to save face and go home.

7   This issue about NIGC jurisdiction of player

8   tracking is not an issue that the tribes can't win.

9   It's an issue that overwhelmingly they can. No one

10   here for the TAC wants to be accused of surrender of

11   any sovereignty to the NIGC over these course of

12   events. Please note NIGC did not originate this. This

13   concept didn't come from the folks we have now. They

14   do find themselves drug to the table with it, and

15   they're going to need some kind of response.

16   I would also point out that one of the things

17   that Tom continues to emphasize is that the TAC is

18   focused op the risk-based regulation. This is all

19   about risk, and, Tom, I'm not making fun of you. I

20   really think that's the most important thing that's

21   been said here. If you have risk-based regulation,

22   there's no risk because you took care of the risk. If

23   you take care of all the risk, there's no -- there's

24   nothing to discuss on a wide scale.

25   The NIGC has, I believe, for this issue at

1   this time failed to evaluate all the risks and document

2   them in their attempt to assert authority over player

3   tracking. The NIGC has in 25USAB134 been given carte

4   blanche (inaudible) that is the class 2 that is defined

5   in.

6   If you expand that so it includes this, you

7   got carte blanche to go copy everything. If you go

8   copy everything in our facilities, your $60,000

9   employees can basically go to Comanches and copy our

10   player tracking information, go to Chickasaws at Wind

11   Star that's a half a mile long, the world's third

12   larger casino, and copy, go over to Choctaw and copy

13   our player tracking, and when Texas, if they came

14   online in a commercial endeavor, he might not lose that

15   when he left your employ and go from being a $60,000

16   employee to a $2 million a year employee for at least

17   two or three years at that Texas facility.

18   There is a risk of NIGC copying that

19   information, especially when you don't have

20   jurisdiction. That's what I'm concerned about. That's

21   a concern here that I think tribal sovereigns need to

22   not forget in this is that that player tracking

23   information would be an emerging Internet market, has

24   enormous value.

25   And with due respect to the NIGC, if the

1   information is lost and it's an NIGC agent that gets

2   that loss of that information, how do we get our money?

3   How do we get what it cost us? Again, if Alabama were

4   to legalize some of their charitable gaming operations

5   and anybody had information of their player tracking

6   information, that would be enormously valuable.

7   MR. FISHER: I need to ask you to

8   respectfully wrap up your comments.

9   MR. GREEN: In sum, there are risks for

10   all of us, and, again, NIGC does not need to exercise

11   jurisdiction in a gray area that puts risk on the NIGC,

12   because just as tribal enterprises can create huge

13   repercussions if we screw up, if it's one of your

14   people that screws us, the repercussions will be on the

15   NIGC.

16   MR. FISHER: Thank you. Anybody on the

17   committee have any questions or anything in response to

18   anything that you've heard in public comment? Anyone

19   else in the audience wish to give public comment

20   directly to the committee? No one stepped forward, so

21   that will bring the public comment period to a close.

22   Let's move into what's on the agenda as our

23   housekeeping, what we need to be doing, looking ahead

24   for our next meeting. I started to capture a list of

25   the action items up on the screen here, including some

 1   of the additional agenda topics for the January meeting

 2   that the agenda planning group can sort through. If we

 3   have time, the agenda planning group may meet this

 4   afternoon before we clear out of here. Otherwise we'll

 5   be doing it by conference call.

 6   We talked about developing a best practices

 7   guidance non-regulatory version, and Christina and Jeff

 8   and Daniel also volunteered to do that, and they're

 9   prepared to do something to bring back to the group

10   before the January meeting. Then the last thing I had

11   on my list was Matt checking on the statistical

12   analysis of game performance from the TGWG perspective.

13   Is there any other action item that got

14   mentioned during the meeting that I didn't capture up

15   here that I need to put up here? I know you can't see

16   the whole thing all at once. Do you want me to go from

17   the top again?

18   MS. STACONA: When will we get the final

19   meeting summary from the first meeting and the next

20   meeting in a draft?

21   MR. FISHER: The draft for October and

22   November will go out to the committee sometime next

23   week. I talked briefly to two of the people on the

24   drafting committee, so I'm probably going to run the

25   November summary past them, the draft of it for them to

1   see the format and things before it goes out to the

2   group, so that might come a little bit later in the

3   week.

4   So next week you should receive the draft --

5   the revised draft October summary and the initial draft

6   of the November summary. Then it will take me probably

7   another week or two to get this one done. Partly how

8   fast this one goes depends on whether the set-up we've

9   done on the November summary is good or whether I need

10 to make changes to that.

11   Anything else to add to the list here?

12   MS. LASH: Voucher systems, did we find

13 that?

14   MR. FISHER: We figured that out.

15 Anybody have anything else? Then I'll put this list

16 into the December meeting summary so that we capture

17 that list.

18   So then let me just check on the agenda to see

19 if there's anything else we needed to do. We talked

20 about the topics for the next meeting. So now we're up

21 at the point where we bring the meeting to a close and

22 give everybody an opportunity to make any concluding

23 remarks or anything that you want to say as we bring

24 this meeting to a close, so I think every meeting I've

25 started at the left and worked our way around, so maybe

1   this time we should start on the right and work our way

2   around to the left.

3   MS. THOMAS: So I don't actually have to

4   say repetitive stuff. I actually don't really have

5   anything to say in closing. This entire process for me

6   has been a huge learning experience just in the

7   different areas where different tribes have concerns in

8   how their regs are put together, so I think a lot of

9   this discussion is great for me to take back home and

10 say this particular tribe sees this issue or this tribe

11 sees this issue. How does it affect us? For me I

12 think that's great.

13   MR. FISHER: Thanks.

14   MR. CULLOO: I'd also like to say that I

15 think again going around the room and listening to the

16 advice and input of my fellow TAC members who certainly

17 has experiences that I don't have is very beneficial to

18 me as I move forward through my operation as we develop

19 some of these internal controls and SOPs and

20 regulations, so I enjoyed it.

21   MS. HAMEL: Well, I think the last two

22 and a half days have been incredible, and we've had

23 great exchange. I think probably by the end of Monday

24 I was worried that we wouldn't get this done in a year,

25 and the progress we made yesterday and today has been

1   incredible, so I think it's been a good experience and

2   showing a lot of great progress.

3   MR. MORGAN: I echo the comments. I

4   enjoyed the dialogue. I always learn something from

5   these meetings. I appreciate how the group is evolving

6   and how the dialogue that goes on with each subject is

7   very helpful.

8   MR. WILSON: I ditto everything, and I'm

9   hopeful that with whatever course corrections we've

10   made from this meeting that our next meeting won't

11   start with a scolding and that we are now on track with

12   NIGC's expectation that you're getting out of this what

13   you need to get out of this in order to conclude on the

14   matters.

15   MR. CALLAGHAN: I enjoyed it. I second

16   what they said and wish everybody happy holidays.

17   MS. CHINO: I think I said at the last

18   meeting I appreciate everybody's support and

19   everybody's advice and issues that I'm learning on, so

20   it's been an experience. Other than that, I say the

21   same thing as everyone else.

22   MS. STACONA: Same thing here. I

23   appreciate everybody's dialogue, and I too am learning

24   a lot and want to thank Leo for inviting us out to his

25   casino.

1   MR. CULLOO: Sorry I confused the dates

2   on that.

3   MS. STACONA: That's okay. It's good to

4   get out and see other properties. I enjoyed spending

5   the off hours with everybody getting to know everybody,

6   so thanks.

7   MR. MAGEE: I echo all the sentiments

8   around the room. It is a great learning experience.

9   It's great to hear from other individuals on the TAC.

10   It is great socializing in a non-work environment

11   getting to know everybody.

12   MR. GARVIN: Thanks to everybody.

13   MS. LASH: I think this is a really good

14   meeting. I too appreciate all the input from the other

15   TAC members, and I mirror Matt's comments that we've

16   evolved and learned and are moving in the right

17   direction. We have important work to do, and I think

18   everybody is doing a great job so far.

19   MS. TAHDOOAHNIPPAH: We continue to be

20   very impressed with the effort of the TAC, and we've

21   taken very serious the tasks that we've been given.

22   Then despite some of the procedural drama that we've

23   had at the start of what seems like every meeting, the

24   latter part of our meetings have been very successful

25   and we accomplished a lot.

1   Then I kind of wanted to just go back to our

2   Connecticut meeting. I was looking through my notes,

3   and we made this long list of principles, and I don't

4   want us to lose sight of those principles, and I'd like

5   to maybe see them maybe kind of up or in the background

6   at every meeting so we can remember that when we're

7   going through these sections that we made these things

8   that we want to remember when we're going through each

9   session that we don't lose sight of those principles

10 that are really important to all of us that we made.

11   I was just thinking about that, because on

12 that list of those principles we had a lot of things

13 about technology and the technological advances that

14 are going to emerge in the future, and it is so

15 important for us to remember those technological

16 advances that are going to come about, and we have to

17 remember that in five years, are parts even going to be

18 applicable or are they going to be left in the dust?

19 In five years, is it going to be a player tracking

20 system or is it going to be something brand new? We

21 have to remember those as we go through those things.

22 That's why it's so important for the regs to be broad

23 enough for tribal gaming.

24   Then I just want to thank Leo very much for

25 inviting us to his casino. The food was fantastic.

1   The staff was great. They were so nice. I want to

2   thank Michelle for the coffee every morning. It's so

3   wonderful. And then I want to say we had a great what

4   seemed like team building exercise last night. A whole

5   bunch of us, we all played trivia, and we all worked as

6   a team, and we had so much fun.

7   MR. WHEATLEY: I really enjoyed

8   especially this meeting. I thought we had some great

9   exchanges and a lot of good substance was discussed,

10   and a lot of conceptual ideas that went around the room

11   that were really important were brought on the table,

12   so I look forward to tackling the same future types of

13   issues in the next few meetings. Thank you.

14   MR. RAMOS: I don't have anything to add

15   that hasn't already been said, but thank you, Leo, for

16   dinner.

17   MR. FISHER: I would echo that. It was

18   great. Thank you.

19   MR. LITTLE: On behalf of Chairman

20   Stevens and Vice Chairman Cochran, the commission wants

21   to thank all of you for once again taking time away

22   from your family and your operations. I know a lot of

23   you have a lot of work at home. You know, in our

24   breaks you're there checking your e-mail, making calls.

25   You still got issues outside of what we're doing here,

1   so once again, the commission really appreciates the

2   dedication that you've all given to this.

3   Mia makes a really good point about the

4   importance of what we're doing here and the long-term

5   effort. You know, this issue or this issue began, you

6   know, because a result of a court action in, again, the

7   early 2000s, you know, and there still isn't a

8   regulation here, so, you know, we need to be looking

9   how it's going to affect this industry, you know, not

10   just one year, two years, but five years and further

11   and make sure that. It's a challenge that we look at

12   all the time. How do we make one regulation fit a very

13   diverse industry?

14   I just want to make a point to thank the

15   Suquamish tribe for hosting this event. Their

16   hospitality has been great. This is a wonderful

17   facility. I think one of the best things about my job

18   is I get to come out and see all the wonderful

19   facilities. You all know this, because you work at

20   them. It's always nice get out here from the northeast

21   to see another beautiful part of our country.

22   I want to thank our staff of Rest and Mike and

23   Rita from our staff. We have a lot of folks. A lot of

24   our audit folks are working on these comparisons. A

25   lot of our folks have spent a lot of time. I always

1   want to make sure I recognize these folks, because

2   without them, we can't do our job.

3   Leo, I guess I could thank you for hosting the

4   event. I wasn't there, but thanks for taking care of

5   this. I really appreciate the hospitality that was

6   shown there. I think that's about it. I want to wish

7   everybody happy holidays, safe travels. Brian, thank

8   you for the gift. We'll play that often, I'm sure.

9   Thank you everyone. Have a safe trip home.

10   MR. FISHER: Thank you everybody. We're

11   adjourned.

12   (Meeting concluded at 11:27 a.m.)

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