



SEP 23 2008

Kathleen Worley, Director
Regulatory Compliance
Aristocrat Technologies Incorporated
7230 Amigo Street
Las Vegas, NV 89119
Fax: (702) 270-1001

Dear Ms. Worley:

This is in response to your letter of May 15, 2008, requesting that the National Indian Gaming Commission (NIGC) review two gaming device agreements (Agreements) between Aristocrat Technologies Incorporated and Bay Mills Resort & Casino.

The purpose of our review is to determine whether either of the Agreements is a management contract or agreement collateral to a management contract and, therefore, subject to the review and approval of the NIGC Chairman under the Indian Gaming Regulatory Act. After careful review, it is my opinion that neither Agreement is a management contract. As such, neither requires the NIGC Chairman's approval.

Thank you for submitting the Agreements for the Office of General Counsel's review. We will forward a copy of the agreements and this letter to the Department of the Interior's Office of Indian Gaming. If you have any questions, please contact NIGC Attorney Michael Hoenig at the number below.

Sincerely,

A handwritten signature in cursive script that reads "Penny J. Coleman".

Penny J. Coleman
Acting General Counsel

cc: George Skibine, Director, Office of Indian Gaming