



POARCH BAND OF CREEK INDIANS

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August 9, 2011

VIA EMAIL: reg.review@NIGC.gov

Lael Echo-Hawk, Counselor to the Chair
National Indian Gaming Commission
1441 L Street, NW, Suite 9100
Washington, DC 20005

Re: Comments to Draft Amendments to 25 CFR Parts 556 and 558

Dear Commissioners:

On behalf of the Poarch Band of Creek Indians, I thank you for the opportunity to comment on the National Indian Gaming Commission's preliminary draft of amendments to 25 CFR Part 556 regarding background investigations for primary management officials and key employees and 25 CFR Part 558 regarding gaming licenses for key employees and primary management officials.

A. 25 CFR Part 556.6(b)

We applaud the Commission's effort to incorporate the Pilot Program into the regulations. Part 556.6(b)(2) recognizes that key employees and primary management officials may be working already when the background investigation is submitted; however, the language in Part 556.6(b)(2)(ii) implies that the background investigation would be submitted prior to the key employees or primary management officials beginning work. We would suggest rewording Part 556.6(b)(2)(ii) as follows: "Date on which applicant will begin or did begin work as a key employee or primary management official" (emphasis added).

B. 25 CFR Part 558.2

The preliminary draft of Part 558.2 suggests that the tribe will provide (1) a background check and (2) a later notice to the Commission if the applicant is not licensed. We believe it would be more efficient for the tribe to provide the background check which includes whether or not the tribe licensed the applicant.

I again thank you on behalf of the Poarch Band of Creek Indians for the opportunity to provide comment on the proposed changes relative to background investigations and gaming licenses of key employees and primary management officials. We look forward to working with you as other proposed changes are circulated.

Sincerely,

Stephanie A. Bryan
Vice-Chair
Poarch Band of Creek Indians