

1 NATIONAL INDIAN GAMING COMMISSION  
2 REGULATORY REVIEW CONSULTATION  
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10 REPORTER'S TRANSCRIPT OF PROCEEDINGS

11 MAY 2, 2011

12 9:00 A.M.  
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17 HELD AT: SPA RESORT CASINO  
18 100 North Indian Canyon Drive  
19 Palm Springs, California  
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INDEX

APPEARANCES:

DANIEL J. LITTLE, NIGC Associate Commissioner  
and Chairman presiding

ERIC SCHALANSKY, NIGC Regional Director

LAWRENCE S. ROBERTS, NIGC General Counsel

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1 Palm Springs, California, Monday, May 2, 2011, 9:09 a.m.

2  
3 MR. LITTLE: All right. Good morning. I'd  
4 like to take this opportunity to welcome all the tribal  
5 leaders, elders and tribal representatives to the  
6 National Indian Gaming Commission consultation session  
7 on Group 1 of our regulatory review schedule.

8 Additionally, I'd like to extend my gratitude  
9 to the Agua Caliente tribe for allowing the NIGC to hold  
10 this session on your land. On behalf of the Commission,  
11 we're very grateful and honored to be able to address  
12 everyone this morning and discuss this very important  
13 issue contained in our Notice of Regulatory Review.

14 My name is Dan Little. I'm the Associate  
15 Commissioner with the NIGC. Today I'm here on behalf of  
16 Chairwoman Tracie Stevens and Vice Chairwoman Steffani  
17 Cochran. They send their regards and look forward to  
18 reviewing the comments submitted.

19 Before I get started, I'd like to turn the  
20 session over to Chairman Michael Prieto of the Agua  
21 Caliente Band of Cahuilla Indians for opening remarks.

22 STATEMENT BY MICHAEL PRIETO

23 MR. PRIETO: Good morning, everyone. My name  
24 is Michael Prieto. I'm the chairman for the Agua  
25 Caliente Gaming Commission. On behalf of the tribe and

1 the Commission, welcome. Good morning. Just briefly, I  
2 wanted to just let everyone know we welcome any kind of  
3 comments, anything in regards to the consultation, and  
4 we welcome everyone here at the Spa Resort. Thank you  
5 for coming.

6 MR. LITTLE: Thank you, Chairman.

7 I'd also like to go around the table and we can  
8 start, Michael, on your left and do some introductions.  
9 If you want to state your name and who you're with?

10 Kelly Hause, Agua Caliente Gaming Commission.

11 Norm DesRosiers, Commissioner of San Manuel.

12 Ed Magdalano, Sycuan Gaming Commission.

13 Queenette Pettiford, Chairwoman, Sycuan Gaming  
14 Commission.

15 Ron Jaeger, United Auburn Tribal Gaming Agency,  
16 chairman of the commission.

17 Dora Bernal, Karuk Tribe.

18 Darlene Vega, Pala Gaming Commission.

19 I'm Larry Roberts. I'm the general counsel of  
20 the National Indian Gaming Commission.

21 I'm Jen Ward. I'm a staff attorney with the  
22 National Indian Gaming Commission.

23 I'm Chris White. I'm the comptroller for the  
24 National Indian Gaming Commission.

25 Norm Hansen, Commissioner, Twenty Nine Palms.

1 Good morning, I'm Jan Sullivan, the Executive  
2 Director for the Cabazon Band of Mission Indians.

3 John Magee, Pechanga Gaming Commission.

4 William Ramos, Pechanga Gaming Commission.

5 Sherry Rodriguez, La Jolla Gaming Commission.

6 Jan Costa, Tribal Administrator, Chicken Ranch  
7 Rancheria.

8 Scott Bachtelle, Chicken Ranch Gaming  
9 Commission.

10 Jan DePauli, Chicken Ranch Gaming Commission.

11 Ed Roybal, Ak Chin Indian Community, on behalf  
12 of the Arizona Indian Gaming Association.

13 Joe Marinko, Twenty Nine Palms Gaming  
14 Commission.

15 Joe Murillo, Executive director, Twenty Nine  
16 Palms Gaming Commission.

17 Joe Webster with Hobbs, Straus on behalf of  
18 Seminole Tribe of Florida.

19 MR. LITTLE: Okay. Let's not let everybody off  
20 the hook on this side.

21 Summer Hathaway, from the Santa Ysabel Gaming  
22 Commission.

23 I'm Bob Goodwin. I'm the Self Government  
24 Coordinator for Karuk.

25 Jane Zerbi, attorney with United Auburn Indian

1 Community and the Auburn Band.

2 Peggy Rhoades, Deputy Executive Director for  
3 the Yuroc Tribe.

4 I'm Eric Kenny, Director for Office of  
5 Government.

6 John Toro, Agua Caliente Gaming Commission.

7 MR. LITTLE: Okay. We also have some staff  
8 from our regional office. We have our regional  
9 director, Eric Schalansky, and his staff includes Alan  
10 Phillips, Frank Hernandez, Manny Sanchez and Kim  
11 Angeles.

12 STATEMENT BY COMMISSIONER DAN LITTLE

13 MR. LITTLE: When this Commission organized  
14 last summer, we developed a vision for this Agency that  
15 includes a commitment to building a meaningful  
16 government-to-government working relationship with the  
17 tribes. In practical terms, we are committed to  
18 respecting tribes as the primary regulators and  
19 understand our responsibilities of federal oversight in  
20 this industry. We understand that tribes and their  
21 regulators are most familiar with their own operations.  
22 We know that tribes differ from region to region, state  
23 to state, and so do their gaming operations.

24 In order to fully support tribal regulation, we  
25 must work with tribes to ensure the integrity of the

1 industry is maintained. Tribes, states and the NIGC  
2 each have an important function in the regulatory  
3 structure created by IGRA. The industry is best  
4 protected when we all perform our role effectively.

5 We've heard from tribes that the process of  
6 consultation is just as important as the substance of  
7 consultation. True government-to-government  
8 consultation must be inclusive, collaborative,  
9 meaningful and must be ongoing dialog and exchange of  
10 ideas. It's not merely a box to check off when  
11 developing policy.

12 With this in mind, last fall the Commission  
13 began a process to identify regulations that possibly  
14 needed review, and on November 18, 2010, we issued a  
15 Notice of Inquiry advising the public that the NIGC  
16 would be conducting a comprehensive review of all  
17 regulations promulgated to implement IGRA and requested  
18 comment on which of its regulations were most in need of  
19 revision, in what order should they be reviewed, and  
20 what process should the commission utilize to make  
21 revisions.

22 In January and February the NIGC held a series  
23 of eight consultations throughout the country to listen  
24 to tribal leaders and invited written comments to be  
25 submitted by February 12th. After reviewing all the

1 consultation transcripts and submitted comments, on  
2 April 1st the Commission published a Notice of  
3 Regulatory Review Schedule. The review schedule  
4 provides a comprehensive agenda for addressing the  
5 regulations raised during the Notice of Inquiry.

6 Based upon the tribal consultations and  
7 comments, the Commission decided to organize the  
8 regulatory review into five groups. The regulations in  
9 each group will be reviewed separately from the  
10 regulations in the other groups, and specific  
11 regulations in each group may proceed through the  
12 regulatory review process independently from the other  
13 regulations in a particular group.

14 Today we're here to talk about those  
15 regulations included in Group 1 of the Notice of  
16 Regulatory Review Schedule. I'm now going to turn the  
17 mike over to Larry Roberts who will proceed in a more  
18 detailed explanation of the process and items contained  
19 in Group 1.

20 But before I do that, once again, I'd like to  
21 invite any tribal leaders to the table or their  
22 representatives, and I want to let everybody know we  
23 have Denise Jones over here. She's a transcriber.  
24 There will be a recording and then a written transcript.  
25 All the proceedings will be on our website at a later

1 date. So when you speak, please say your name and your  
2 organization before you make your comments. And then  
3 all the comments will be posted on our website at a  
4 later date.

5 I'm going to turn it over to Larry Roberts  
6 right now. Thank you.

7 STATEMENT BY LAWRENCE ROBERTS

8 MR. ROBERTS: Good morning, everyone. Thank  
9 you all for attending this consultation this morning,  
10 early Monday morning, starting the week off right, and  
11 we're here to hear from you, the tribes, in terms of  
12 what regulations we should be looking at and how the  
13 Commission shall proceed. So I'm going to run through a  
14 relatively short PowerPoint, and it's going to outline  
15 the process, and then after that, Commissioner Little is  
16 going to open up the floor to comments.

17 For those of you that attended consultations on  
18 our Notice of Inquiry, the Commission has been very  
19 clear about its commitment to Executive Order 13175 and  
20 consultation with tribes. And today is part of that  
21 process.

22 The executive order reads that, where possible  
23 when we're formulating and implementing policies that  
24 have tribal implications, that we consult with tribes,  
25 and in determining whether to establish federal

1 standards, that we consult with tribes as to the need of  
2 federal standards and alternatives.

3 And so today, as we're going through this  
4 process for Group 1, you'll see that there's a proposed  
5 draft that should be in all of your packets of  
6 materials. That's a preliminary draft, and it is  
7 intended to encourage and invite comment from tribes  
8 before the Commission decides whether to move forward  
9 with that draft.

10 So the review process is moving forward in  
11 three phases and we're in Phase 1, the preliminary  
12 drafting phase. We are encouraging the tribes to submit  
13 written comments on Group 1 as soon as possible as well  
14 as holding these consultation meetings across the  
15 country.

16 It's important to note that in these three  
17 phases after this preliminary phase, if the Commission  
18 decides to move forward with a proposed rule and any of  
19 these regulations in Group 1, that the proposed rule  
20 would be put out for a 60-day comment period, and  
21 consultation would occur on the proposed rule. And then  
22 after reviewing comments on any proposed rule that's  
23 issued, the Commission would then move forward with the  
24 final rule.

25 And what's important for folks to keep in mind

1 in the context of this process is the Commission has  
2 laid out a consultation schedule that extends basically  
3 from last week until early February, I believe. And so  
4 consultations at this point, for example, in Group 1, or  
5 in the preliminary drafting phase, the preliminary draft  
6 of the fee regs that will be circulated, at some point  
7 in time those may move forward in a proposed ruling, in  
8 which case consultations that are already scheduled we  
9 would cover on a proposed fee ruling if the Commission  
10 decides to move forward.

11 So it's important to note that this  
12 consultation schedule that's established from now  
13 through February will overlap all three of these phases.

14 The Commission has decided to move forward with  
15 five groups of regulations, and the group numbers are  
16 not indicating a priority, per se, but they are  
17 basically groups of regulations that the Commission  
18 thought would make sense in moving forward with in terms  
19 of consultation and having the most use of these  
20 meetings.

21 And so they concern a number of factors,  
22 including subject matter, the comments we receive from  
23 tribes and the public in response to NOI and the  
24 estimated time and resources to complete these tasks.

25 Again, this is the preliminary discussion

1 drafts and you should know that these preliminary  
2 discussion drafts and any future preliminary discussion  
3 drafts will be posted on our website. Also, keep in  
4 mind, as Commissioner Little mentioned, this meeting is  
5 being transcribed and that any written comments received  
6 as part of these consultations or the transcripts, those  
7 will also be posted on our website.

8 The Commission's commitment to the public and  
9 to tribes is that every comment received will be  
10 reviewed and considered, that any proposed or final rule  
11 will include a summary of all the comments received from  
12 you, and that the Commission is committed to making this  
13 process as clear and transparent as possible.

14 So today we're covering Group 1, and we have  
15 five areas that the Commission has identified for  
16 consultation. The commission would really like to hear  
17 feedback from all of you in terms of your thoughts and  
18 moving forward: fees, the review and approval of  
19 existing ordinances or resolutions, facility licenses, a  
20 proposed Buy Indian Act regulation, and how to move  
21 forward with minimum internal control standards for  
22 Class III gaming.

23 With regard to fees, in your packet of  
24 materials we have a preliminary discussion draft, and  
25 there are a number of proposals that we can walk through

1 in more detail. But primarily one of the primary  
2 aspects of the draft is to move the collection of  
3 fees -- the calculation of fees to be based on a gaming  
4 operation's fiscal year rather than a calendar year, as  
5 it's currently drafted.

6 It's also moving the fee rate to be published  
7 by March 1st rather than February 1st so that the  
8 Commission has more detailed and accurate information  
9 for an accurate preliminary rate.

10 To remove the term "amortization" from the  
11 section of the regulations to reflect the existing  
12 practices. The Commission is, in this preliminary  
13 draft, understanding that our intent was not to be a  
14 substantive change, this is something we would like  
15 comments from in terms of if you think that removal of  
16 amortization would actually have a substantive change.

17 It would again move to a quarterly payment  
18 schedule and clarify that when computing fees, that the  
19 operation will use a calculation as set forth in Part  
20 514(b), and this is not intended to be a substantive  
21 change.

22 And then notification. A notification period  
23 for when a gaming operation may change its fiscal year  
24 so that we have that information and can adjust  
25 accordingly.

1           One of the things that the Commission has put  
2 forward in this preliminary draft for discussion with  
3 tribes is a late payment system. We heard some comment  
4 and some interest from tribes and the public in response  
5 to the NOI. So this section, which we can talk about in  
6 more detail today, basically defines a late payment  
7 versus a failure to pay annual fees.

8           And the way that is structured is that a late  
9 payment would result in a fee, some sort of a fee based  
10 either on percentage of the fees that were owed or some  
11 sort of flat fee for a late payment. Whereas a failure  
12 to pay would actually constitute a substantial violation  
13 that could result in an NOV.

14           Also, as I'm sure most of you are aware, for  
15 some time the Commission has been processing  
16 fingerprinting cards that it receives from tribes and  
17 forwards on to the FBI and provides that information and  
18 service to tribes. This part of the regulation is new  
19 and basically just clarifies that process and sets forth  
20 that the NIGC will publish fees for the  
21 fingerprinting processing on a biannual basis.

22           And some of the questions that the Commission  
23 would like feedback from Indian Country on is whether,  
24 in the context of the fee regs itself, whether admission  
25 fees should be changed to an entry fee.

1           We've heard that in the broader context of fees  
2 and admission fees, that entry fee is more of an  
3 incorporated term rather than admission fee. Also,  
4 should tournament fees be included in that example of  
5 admission or entry fees.

6           We received some comments from the tribes in  
7 response to the NOI about the Commission should look  
8 closely at whether it should accept or adopt a  
9 definition of gross gaming revenue consistent with GAAP.  
10 That is not in this discussion draft, but we do want to  
11 hear from Indian Country as to whether we should move  
12 forward, whether the Commission should work to  
13 incorporate the definition of gross gaming revenue so  
14 that it is consistent with GAAP, or, if not, why not.  
15 Also whether the Commission should consider defining  
16 "wager" and "payout" as set forth in the statute.

17           The next regulation in Group 1 the Commission  
18 has put forward in terms of a proposed repeal of Part  
19 523. Part 523 only applies to ordinances that were  
20 enacted by tribes prior to 1993 and that were not  
21 submitted to the Chairwoman for review and approval.

22           The Commission's inclination is that this part  
23 is no longer relevant, that every tribe has an approved  
24 gaming ordinance and that there are no other ordinances  
25 that would be affected by the repeal of Part 523.

1           And so before moving forward with any process  
2           on whether to repeal Part 523, the Commission would  
3           greatly encourage tribes to let us know if they believe  
4           that they would be impacted by that repeal.

5           Part 559 of the regulation, Facility License  
6           Notifications, Renewals, and Submissions. The  
7           Commission is interested in moving forward with a  
8           preliminary draft regulation of this part.

9           But before moving forward, some of the  
10          questions that we would like to hear from Indian Country  
11          is, should this part be revised. We've heard, in  
12          response to the comments to NOI, a number of tribes  
13          asking the Commission to review this part. And as part  
14          of our discussion today, the Commission would like to  
15          hear what are the issues that tribes are confronted with  
16          Part 559 and which sections should be reviewed further.

17          In the NOI the Commission asked the question of  
18          tribes as to whether they should consider adopting a  
19          regulation that would implement the Buy Indian Act, and  
20          comments from the public and tribes and the NOI were  
21          generally supportive of a regulation. It would allow --  
22          again, this regulation would apply to the NIGC itself.  
23          It wouldn't apply to tribes, and so it would be  
24          requiring the NIGC to encourage buying Indian when  
25          purchasing goods and services and property.

1           This is already supported by the statutory text  
2 of IGRA which provides the Commission with authority to  
3 contract with states, tribes and other entities when  
4 implementing the act. And this is another proposal that  
5 the Commission is intending to distribute a preliminary  
6 draft for in the near future.

7           The last part is the Class III MICS issue, and  
8 this issue is in both Group 1 and Group 5 because the  
9 Commission recognizes that not only is it an important  
10 issue, it's an issue that has a number of implications  
11 and affects different tribes and regions across the  
12 country.

13           And so today, as part of this discussion, what  
14 we're really hoping to hear from tribes is what  
15 structure should NIGC use to address the Class III MICS  
16 issue and getting feedback from tribes as to how to move  
17 forward after the group decision.

18           In Group 5 -- so the Commission structure in  
19 Group 1 is to hear from tribes as to how NIGC should or  
20 should not address the Class III MICS issue, and in  
21 Group 5 looking at actual practical implementation of  
22 the discussions of what we hear and the proposals we  
23 hear in this consultation.

24           And I think probably everyone in the room is  
25 aware that the National Indian Gaming Commission did not

1 have authority to promulgate regulations establishing  
2 Class III MICS, and the Class III MICS are, in some  
3 areas of the country, incorporated by compacts.  
4 Obviously, the Commission is aware in California some  
5 tribes have moved forward to amend their gaming  
6 ordinances to provide NIGC with authority over Class III  
7 MICS issues.

8 I know that it affects tribes in California  
9 differently as well, and so we want to hear -- the  
10 Commission wants to hear suggested approaches on how to  
11 move forward. Here's what we heard in response to NOI,  
12 and the NOI was just asking the question obviously  
13 should the Commission look at Class III and how should  
14 they move forward in terms of process.

15 In response to that very basic question, we had  
16 a number of tribes and the public basically tell the  
17 Commission here are different ways in which you should  
18 consider moving forward. Some tribes suggested  
19 replacing Part 542 with guidelines. Some tribes  
20 suggested a compacting process between NIGC and tribes.  
21 Some tribes support an approach incorporating 542 into a  
22 tribal ordinance, and some tribes suggested maintaining  
23 Part 542 and convening a tribal advisory committee to  
24 update, and then finally some tribes suggested repealing  
25 Part 542.

1           So with that I'm going to turn it back over to  
2 Commissioner Little.

3           MR. LITTLE: Okay. Before we begin, I just  
4 want to invite any tribal leaders that might have come  
5 in to take a seat at the table if they'd like. The  
6 second thing is the meeting is being recorded and it  
7 will be transcribed, so if you do make a comment, please  
8 say your name and your organization, party speaking.

9           And then lastly I obviously want to point out,  
10 and hopefully embarrass, former Commissioner Norm  
11 DesRosiers is here with us today, so thank you for being  
12 here.

13           With that, let's get right into it and I'll  
14 open up the floor for comments on Part 514, the fees  
15 regulation, and see if anyone has any comments they want  
16 to start off with. I hope you've had an opportunity to  
17 take a look at our preliminary draft. I think it's been  
18 up on the Web for about a week. We have Chris White,  
19 our comptroller, here to help us maybe answer any  
20 questions you might have.

21           Would anybody like to start off?

22           Okay. I guess I could start some conversation.  
23 What we talked about, it was suggested an effective date  
24 of 12/31 for the new fee reg and in doing so will avoid  
25 further confusion by keeping the timeline consistent

1 with the fee rate which will continue to apply to a  
2 calendar year.

3 Anybody have any comments how this date may  
4 affect the implementation of the new reg by your gaming  
5 operation accounting systems? Does anybody prefer a  
6 different effective date?

7 STATEMENT BY NORM DESROSIERS

8 MR. DESROSIERS: Norm DesRosiers, San Manuel.  
9 I don't know about everybody else, but this particular  
10 subject matter is probably beyond the technical  
11 expertise of most of us in this room. We rely on our  
12 accountants and our CPAs and our auditors to comment on  
13 this.

14 I mean, my intention is to take your draft back  
15 and promptly give it to those that do the bean counting  
16 and let them let me know what their comments are. So  
17 I'm not -- although I appreciate having this today, I'm  
18 not sure you're going to get -- unless we have some  
19 accountants in the room -- much meaningful comment on  
20 it.

21 MR. LITTLE: All right. I appreciate that.  
22 Thank you.

23 Would it be helpful maybe if we kind of skipped  
24 around the 514? because there's a lots of stuff in  
25 there, and I think the most comments that we heard about

1 was the late fees/ticketing system. Does anybody have  
2 any comments on how they would -- if they support that  
3 process?

4 You know, a notice of violation is a very  
5 important issue and having 12 years of experience in  
6 working in this industry, over ten years with the tribe,  
7 I understand that those issues are not taken lightly.  
8 They're critical for tribes when they're trying to go  
9 out and get financing, when they're negotiating  
10 compacts. Public relations-wise, there are major  
11 problems, and the Commission wants to talk about, you  
12 know, is there a better process.

13 Obviously, you know, you don't like anybody  
14 paying their fees late, but is there a better process  
15 for getting the point across to tribes that fees are  
16 critical to our operation? That's how we fund the NIGC.  
17 We don't get a federal appropriation and it's important  
18 at that time tribes pay the fees on time. But does  
19 anybody have any comment on a proposal to change the way  
20 that late fees are handled?

21 STATEMENT BY JOE WEBSTER

22 MR. WEBSTER: Joe Webster, attorney with Hobs,  
23 Straus, Dean & Walker. I certainly agree in terms of  
24 the approach. I think it's preferable to get a  
25 (inaudible) approach. I guess one question I had,

1       though, in looking at it, this is only a preliminary  
2       draft, but the percentages and the amounts for what  
3       those late fees would be are blank.

4               I guess I'm curious whether the Commission had  
5       some concept in mind in terms of, you know, what would  
6       be the magnitude of late fees that would be applied.

7               MR. LITTLE: To be honest, we're actually open  
8       to hear what tribes think about what the -- whether it  
9       be percentage, flat fee. That's up until 92 days,  
10      which, I think, is -- I believe is still that after 92  
11      days there still should be probably a notice of  
12      violation.

13              Like I said earlier, the fees are critical to  
14      our operations, but at some point we do have to kind of  
15      move in a manner that is appropriate. So I think we're  
16      really kind of interested to hear what folks think,  
17      whether it's based upon a percentage, a flat fee, the  
18      size of the gaming operation, what have you.

19              So if anybody has any comments or suggestions,  
20      we're interested in hearing about it.

21              MR. WEBSTER: Thank you.

22                              STATEMENT BY LAWRENCE ROBERTS

23              MR. ROBERTS: I'm Larry. I also want to note  
24      that in the draft -- well, these are reference for  
25      everyone. What we did is, we're looking at basically

1 page 5 and then we've numbered the lines. So this late  
2 fee schedule really starts to kick off at about line 13  
3 of page 5, and so it's drafted in a way that we hope  
4 would provide clarity to tribes.

5 Again, as Commissioner Little stated, either in  
6 terms of a flat fee or a percentage, but it also  
7 provides a process whereby the Chair may propose  
8 something lower than what's set forth in here. It's  
9 drafted to provide discretion and to take into account  
10 certain situations as well as providing an appeals  
11 process of -- let's say, for example, we issue a letter  
12 stating that the fees are submitted late, and the tribe  
13 comes back relatively quickly and says, no, actually we  
14 didn't submit on X date.

15 So it provides that process for appeals to make  
16 clear that this process, before you get to the annual --  
17 or to the actual failure to pay an annual fee, there's a  
18 process in place for the tribe and the Commission to  
19 interact on this issue.

20 STATEMENT BY NORM DESROSIERS

21 MR. DESROSIERS: Norm DesRosiers, San Manuel  
22 Gaming Commission. I agree with Mr. Webster. I like  
23 the concept. NOVs are a serious matter and, of course,  
24 in my experience almost always result in a fine of some  
25 sort and a settlement agreement.

1 I think a percentage is appropriate and answers  
2 the question of whether it's a big operation, a small  
3 operation, whatever that fee is, you know, will be -- a  
4 percentage will be relative to -- takes away that  
5 concern. So it's a constant penalty, if you will, no  
6 matter what the size of your operation is.

7 I just have one curious question that perhaps  
8 you general counsel can answer, and I'm wondering what  
9 the legal distinction is between a late fee imposed and  
10 a fine.

11 MR. ROBERTS: The way this preliminary draft is  
12 structured is that this is -- the way this is set out is  
13 that it's a late fee, and it doesn't constitute a  
14 violation until you get to the 92nd day, so then it  
15 becomes a failure to pay annual fees under the act.

16 And so we've set forth a regulatory structure  
17 where basically there's a 90-day window before we're  
18 interpreting whether there's a failure to actually pay a  
19 fee.

20 MR. LITTLE: I hope that answers your question.  
21 Maybe not?

22 MR. DESROSIERS: Yes.

23 STATEMENT BY JAN SULLIVAN

24 MS. SULLIVAN: I'm Jan Sullivan with the  
25 Cabazon Band. I have a question regarding is this fee

1 specific to these or would this apply to other areas  
2 where NOVS would be applicable?

3 MR. LITTLE: My understanding is this is just  
4 inclusive of fees. Do you suggest any other areas,  
5 or --

6 MS. JAN SULLIVAN: No. The prior meeting in  
7 San Diego, I thought it was going to apply more broadly  
8 some type of a structure for late fees or other areas  
9 where an NOV might be a little too strong. So I was  
10 just curious if that was going to be carried across and  
11 that would affect how it's calculated and such.

12 MR. LITTLE: Okay. Well, if you have any  
13 thoughts, if you want to put them in some words and send  
14 it, we'll be interested in hearing from you.

15 MR. ROBERTS: My understanding is, there has  
16 been some discussions and other consultations that this  
17 be applied to audit reports and late audit reports being  
18 submitted, so that might be another area where this  
19 might be applied in the future.

20 STATEMENT BY JANE ZERBI

21 MS. ZERBI: Hi. Jane Zerbi, attorney with  
22 United Auburn Indian Community of the Pala Band of  
23 Mission Indians. At the consultation at San Diego, we  
24 raised the concept of, in California, we have seen a  
25 practice of prior to moving to an NOV, the issuance of a

1 letter or even a meeting where an NIGC site inspector  
2 would bring it to the attention of the gaming agency or  
3 Commission and potentially the tribe of an issue, giving  
4 that tribe an opportunity to implement this (inaudible)  
5 practice.

6 I think that's what Jan may be referring to,  
7 because what we saw -- or I saw the kind of ticketing  
8 system suggestion. My comment was, let's not go  
9 immediately to a ticketing situation in every instance  
10 and use this practice (inaudible) to the best practice.

11 MR. LITTLE: It's my understanding, correct me  
12 if I'm wrong or fill in the blank, is that the  
13 Chairwoman has a lot of discretion. I think she would  
14 obviously take into account whether there was any past  
15 violation or not.

16 MR. ROBERTS: I think your question about --  
17 and actually it gets back to your question as well in  
18 terms of the enforcement situation. That's going to be  
19 covered in Group 2 of the consultation. So what you  
20 heard in San Diego, I guess it was, that's something  
21 that the Commission is in the process of looking at now  
22 and will be rolling out as a part of Group 2  
23 consultation.

24 STATEMENT BY JOE WEBSTER

25 MR. WEBSTER: Just a follow-on question. In

1 looking at the way that it's structured with the late  
2 fees, I guess up through about three months or so, and  
3 then possibly an NOV after that, would a tribe that  
4 failed to pay for those three months then be subject to  
5 both a late fee and a fine as far as the NOV process?

6 MR. ROBERTS: It's a good question. It's  
7 something that we would have to brief the Commission on,  
8 and I'm sure it's something that would form their  
9 analysis. It's not addressed one way or another in this  
10 draft, so it's something the Commission would want to  
11 address in the future.

12 MR. LITTLE: Was there anyone else that would  
13 like to make a comment?

14 STATEMENT BY NORM DESROSIERS

15 MR. DESROSIERS: Norm DesRosiers. It's more of  
16 a question -- and I think this all ties in together --  
17 but if 60 days late, a tribe submits what they owe in  
18 fees but doesn't want to pay the late fee, what happens?

19 MR. LITTLE: Like I said, the Chairwoman has a  
20 lot of discretion, and I think each case would be  
21 handled independently, and we definitely will want to  
22 address that regulation, so I mean --

23 Would you say Group 2?

24 MR. ROBERTS: It's a good question. We would  
25 have to structure how that would be addressed in the

1 actual regulation itself, but, you know, there are going  
2 to be a number of different options for the Commission  
3 to move forward.

4 I suppose one option would be if they paid the  
5 fee but they don't pay the late fee, is there then some  
6 violation of the regulation and how the Commission would  
7 move forward. I think that's a good observation and a  
8 good question and it's something that the Commission  
9 would have to take into consideration in terms of moving  
10 forward with a proposed rule.

11 STATEMENT BY JANE ZERBI

12 MS. ZERBI: Jane Zerbi. I also have a  
13 question. In the past when you've done an NOV, if a  
14 tribe pays late, does that always come with a fine or a  
15 penalty, financial penalty, or is that a slight change  
16 here?

17 MR. LITTLE: I'm not aware -- I think I can say  
18 it's handled on a case-by-case basis.

19 Larry would definitely know.

20 MR. ROBERTS: The idea here is to obviously  
21 avoid an NOV at all just because of the ramifications of  
22 that. I haven't personally done a comprehensive review  
23 of all of the NOV's, but I think there's always been some  
24 sort of payment involved and, if not, then it was sort  
25 of handled on a case-by-case basis.

1 MR. LITTLE: Are there any other comments on  
2 this issue or any of the other -- anything specific to  
3 Part 514? If not, I guess we can move on to Part 523,  
4 and these are the repeal of, I guess you could say  
5 ordinances that were in place prior to --

6 MR. DESROSIERS: Norm DesRosiers. I'm sorry,  
7 but I didn't realize it was part of 514, but the  
8 fingerprint thing?

9 MR. LITTLE: Oh, okay. Sure.

10 STATEMENT BY NORM DESROSIERS

11 MR. DESROSIERS: Norm DesRosiers. The concept  
12 here again, and I respect and, of course, I went through  
13 a lot of this with Chris, and we actually reduced the  
14 fees from what they used to be based on the same type of  
15 (inaudible), but for your benefit, NIGC's, you're  
16 locking yourself into this review every couple years,  
17 and from my limited knowledge, those -- well, your costs  
18 may vary, but, I mean, certainly, the FBI's cost didn't  
19 change for, like, 20 years almost, and those stay pretty  
20 constant, and I'm wondering if there's enough  
21 anticipated fluctuation.

22 And, Chris, you would know better probably than  
23 anybody, but that would justify the need to go through  
24 this hoop every other year, maybe every five years. I  
25 don't know.

1 MR. WHITE: The process we anticipate going  
2 forward in reviewing the fingerprint processing costs is  
3 not that labor intensive. I think the initial review we  
4 did that you were a part of a couple years ago was the  
5 most -- took the most time. It's something that we can  
6 update pretty easily looking at our personal costs,  
7 equipment replacement, overhead, those sorts of items.

8 And what we sort of envisioned when we wrote  
9 this draft was publishing the fingerprint rate  
10 concurrently with the regulatory fee rate as part of the  
11 same announcement. And so the review that we undergo to  
12 review the regulatory rate, we would do at the same  
13 time, review our fingerprint processing costs.

14 MR. LITTLE: Are there any other comments on  
15 514?

16 In the NOI, the comments we heard from tribes,  
17 is that they reflected the ability to choose to pay fees  
18 based on a calendar or a fiscal year. These regulations  
19 require a fiscal year. Does anybody have any comments  
20 on how changing from a calendar year to a fiscal year  
21 will affect your tribes?

22 I know that, Norm, you (inaudible) but it's  
23 something we're definitely interested in. If you folks  
24 want to submit written comments later, that would be  
25 fine. Is there anyone commenting on that?



1           So it seems to me, as a threshold question  
2 before getting into the details of the regulation  
3 itself, is maybe a discussion of whether the regulation  
4 itself is even appropriate and should remain in place.

5           MR. LITTLE: Thank you. Anyone else want to  
6 comment?

7           MR. ROBERTS: Setting aside the question on  
8 authority, I think some of the things that the  
9 Commission is interested in hearing if they are looking  
10 at -- rather than repealing the regulation, if there are  
11 going to be amendments made to it, are there areas where  
12 we can (inaudible) the Commission can consider amending  
13 it to reduce redundancies.

14           So, for example, the regulation provides for  
15 tribes that provide information to NIGC on environmental  
16 health and safety issues. We've heard in the context of  
17 comments from tribes and the public that some of these  
18 things are already covered in the tribal-state compacts,  
19 some of these are covered through tribal agreement with  
20 EPA or with states outside of the compacting process.

21           So we would like to -- and I see a number of  
22 heads nodding around the room, we would like to know how  
23 can we reduce the redundancies, if there are any in this  
24 regulation, that would streamline the process but still  
25 ensure that the facilities are adequately protected.

1 MR. LITTLE: Any comments?

2 STATEMENT BY JANE ZERBI

3 MS. ZERBI: Jane Zerbi. The United Auburn  
4 Indian Community, in its written position -- so I'll  
5 repeat it here, their comment was that as you look at  
6 amending or revising it, to retain the part of it that  
7 they believe are tribal sovereignty in the sense of  
8 asking tribes to identify what tribal laws we have in  
9 place and to certify compliance.

10 MR. LITTLE: Okay. Thank you. Does anybody  
11 have any comment on the time frame? You know, how  
12 frequently should a tribe renew their facility license?  
13 We'll be interested in hearing that.

14 STATEMENT BY JOSEPH WEBSTER

15 MR. WEBSTER: Just, I guess, a process  
16 clarification: If the approach is going to be to look  
17 at the drafting -- make drafts of changes to the  
18 regulations, is the thinking of the Commission that a  
19 tribe should submit their comments and the Commission  
20 will be producing a proposed draft, or that some other  
21 mechanism will be working through, you know, who should  
22 be used to try to take an additional crack at a rewrite?

23 MR. LITTLE: I think that's the purpose of this  
24 discussion today, is to hear what tribes want to do or  
25 what they suggest, whatever aspect, whether we review

1 it, whether we go to an advisory committee. So we're  
2 definitely interested in hearing what the tribes feel  
3 would be an appropriate mechanism for moving forward  
4 with this. So any comments would be appreciated on  
5 that.

6 STATEMENT BY JOSEPH WEBSTER

7 MR. WEBSTER: I certainly think there would be  
8 some value to maybe having a working group of some form  
9 in trying to address some of these issues. I think it  
10 would be easier to do that in that type of format rather  
11 than a large group discussion like this.

12 MR. LITTLE: We're just making great time here.  
13 And if, for some reason, you think of a comment on an  
14 issue that we may have already covered, please just pipe  
15 in and we can go back. We want to make sure everybody  
16 has an opportunity to fully express their ideas. As you  
17 know, former commissioner DesRosiers has --

18 Norm, do you want to --

19 STATEMENT BY NORM DESROSIERS

20 MR. DESROSIERS: To follow a little bit on the  
21 process, I'm not sure I'm clear, and maybe I  
22 misunderstood, but the NOI -- I thought this was it. I  
23 thought it articulated what was under review, what the  
24 Commission's concern was, what kind of things you want  
25 to comment on, and you've done plenty of it, comments,

1 that was a great process. So I want to -- now what do  
2 we do? How much comment do you need? How many times  
3 are we supposed to submit comments on that stuff? So  
4 that's where I'm a little -- wondering what's going on.

5 MR. ROBERTS: And in terms of clarifying the  
6 process, the NOI was really structured not for  
7 substantive comments on these or the actual changes that  
8 should be made and here's why: It was more to ask the  
9 basic questions of what regulations should be reviewed  
10 and in what order and through what process.

11 And so as a result -- and the NOI, a number of  
12 tribes, as most folks know, submitted not only their  
13 thoughts in terms of which regulations were important to  
14 be reviewed, but why they were important and here are  
15 the changes that should be made. So some of those  
16 comments were substantive. A lot of comments were  
17 substantive.

18 So the Commission has reviewed those comments  
19 and said, okay, the NOI was really intended to structure  
20 the process moving forward of the regulatory review.  
21 Now we are in the substantive phase of the Commission  
22 review and regulations, and what the Commission has  
23 decided -- the approach that they decided to adopt here  
24 is that, rather than just issuing a notice of proposed  
25 rulemaking in the federal register and dropping that and

1 saying, here it is, provide your written comments, this  
2 Commission, in taking a step back, is saying we've heard  
3 from you through the NOI process. Here are the regs  
4 that we want to talk about today.

5 And for some of these we have preliminary  
6 drafts available. For some of these we would like your  
7 comments in terms of how do we move forward  
8 substantively. Is it a tribal working group that puts  
9 together their comments and submits them to NIGC? Is it  
10 some sort of more formal process where NIGC is actually  
11 involved in that? Or is it where tribes say, you know  
12 what, NIGC, you move forward with the preliminary draft,  
13 circulate it and we'll comment on that.

14 From that process, we'll move forward -- the  
15 Commission will move forward with a notice for proposed  
16 rulemaking if it makes sense. So, for example, and we  
17 do not have deadlines right now for written comments, I  
18 expect the Commission is going to be issuing those  
19 shortly so the tribes know, okay, here's the closing  
20 date for the preliminary draft review. Here's when we  
21 would like written comments from you in terms of  
22 Group 1.

23 But during this process, then the Commission  
24 will review those substantive comments and decide to  
25 move forward either with a proposed rule or to say, you

1 know what, we've reviewed all the comments we've  
2 received, and tribes have said, for example, Part 523  
3 should not be repealed and here are the reasons why and  
4 the Commission would, if they decided not to move  
5 forward with that repeal, they would issue a notice  
6 saying we've decided that we're not moving forward with  
7 a proposed repeal of Part 523.

8 And so this process, while it feels like  
9 there's a lot of consultation and back and forth on  
10 substance, that's exactly what the Commission intends to  
11 achieve, is to have a back-and-forth dialog before we  
12 get too far down the road of proposed rules.

13 As I mentioned during the PowerPoint, at some  
14 point, the Commission is going to be moving forward, for  
15 example, fees. Consultation on the preliminary draft of  
16 fees last week, we're holding this one today, we're  
17 holding another one on Friday in another part of the  
18 country, and after a few of those, the Commission may  
19 decide, okay, we're going to set out a written timeline  
20 for -- or a timeline for written comments and after  
21 those are received, we're going to move forward with  
22 that or we're not going to move forward and we're going  
23 to tell tribes we're not. So that process may be  
24 popping up during the consultation.

25 So there's the preliminary, then there's the

1 proposed rule, in which case when there's a proposed  
2 rule, it will just follow the normal rulemaking context.  
3 There would be an opportunity for public comment, there  
4 will be an opportunity for consultations, and then they  
5 move forward with the final regulations.

6 So we are at the early stage in this  
7 preliminary process, but this is intended to -- and I  
8 understand that the Commission understands that most of  
9 the types of comments may come through writing, through  
10 the written format, but we want to engage early with  
11 tribes. You guys are the primary regulators. We want  
12 to make sure that any proposed changes take into account  
13 that viewpoint.

14 MR. DESROSIERS: Thank you. That helps me  
15 understand. I would comment that I, and I think a lot  
16 of us, do find it helpful to have that preliminary  
17 draft. I think that stimulates more thought and  
18 discussion and comments than looking at a slide  
19 visualizing what might need changing. So that's as far  
20 as process goes.

21 Now, the other question is the process  
22 developing that preliminary draft, should that be an  
23 advisory committee? Should that be through your office  
24 of general counsel? How do you get there? Either of  
25 these steps are important before the proposed rule. So

1 I don't know.

2 I don't think -- I like advisory committees.  
3 Subject matter experts out there in the field I think  
4 contribute a lot to developing a good regulation, but I  
5 don't think that every regulation, you know, is at the  
6 level where it needs a committee to do it.

7 So I'll just leave it at that. Thank you.

8 MR. LITTLE: Larry's an attorney. Obviously  
9 you never say anything without a lot of words.

10 MR. ROBERTS: One more quick follow-up is just  
11 that, you know, the preliminary draft may be a useful  
12 approach to stimulate discussion, and if the Commission  
13 goes forward with the preliminary draft and circulates  
14 that, that certainly doesn't preclude any sort of  
15 working groups or travel advisory committees after that  
16 based on feedback after the commission hears from  
17 tribes.

18 MR. LITTLE: It's important that we -- that's  
19 the purpose of today, we want to hear what do you think.  
20 A lot of folks like working groups or travel advisory  
21 committees, but the (inaudible) can get expensive.  
22 We're very cognizant of that. If every one of these  
23 regulations required advisory, a committee, they could  
24 bear costs themselves, but it's very important that you  
25 share with us what your thoughts are.

1           And I know this regulation is very contentious  
2 when it was promulgated a few years ago, and we want to  
3 make sure that -- you know, tribes are not happy with  
4 the way the process went. We want to make sure that we  
5 avoid that, that everybody is comfortable that their  
6 comments are received and taken seriously.

7           So does anybody have some comments over here?  
8 Did anybody else have any comments? Larry? No?

9           I guess we can move on to the Buy Indian Act.  
10 One thing I think is important to point out, this is  
11 actually just for the Commission, this isn't something  
12 that we're asking from the tribes. This is just for how  
13 the Commission procures goods and services, and we're  
14 interested in hearing what tribes feel about how we go  
15 about doing that, whether we adopt a regulation similar  
16 to something that Indian Health Services has, whether it  
17 be a policy.

18           One of the things, my personal observation is,  
19 you know, we want to make sure we try to utilize tribal  
20 facilities as much as we possibly can. We understand  
21 that our -- we don't get a federal appropriation, that  
22 our proffering budget comes exclusively from the fees  
23 that you all pay. We want to be very good stewards of  
24 those fees, and I guess maybe a testament to the  
25 strength of this industry is that sometimes we go to

1 different areas and the tribal facility is more  
2 expensive. It's a lot more expensive than a non-Indian  
3 facility.

4 Do tribes feel that we should still utilize  
5 that tribal facility even though it might be more  
6 expensive than a non-tribal facility which could incur  
7 greater costs? Or is it more appropriate to go with a  
8 lower cost and save some fees or some funding?

9 So does anybody have any comments about how  
10 they feel? Once again, this is only for the Commission.  
11 It is not something that we're requesting that tribes  
12 adopt. It's a sovereignty issue that each tribe will  
13 take upon themselves.

14 STATEMENT BY JOHN MCGEE

15 MR. MCGEE: John McGee of Pechanga. The  
16 comment that I have to say is that your salaries and the  
17 support of the NIGC structure comes from the tribes  
18 themselves. So it only seems that -- I get the cost  
19 structure, but it would seem that to reciprocate you  
20 probably should be staying at the tribal facility, even  
21 if they are more expensive. Thank you.

22 MR. LITTLE: Thank you. Anyone else?

23 STATEMENT BY NORM DESROSIERS

24 MR. DESROSIERS: Norm DesRosiers. Just one  
25 comment. I just happen to think that you could

1 adequately satisfy the desires to buy Indian through  
2 policy rather than regulation.

3 MR. LITTLE: Thank you. One of the issues that  
4 we come across quite often is that at the federal agency  
5 we have to follow the GSA schedule, we have to follow  
6 annual -- our area of per diem rates and things like  
7 that. And it's difficult sometimes finding a tribal  
8 facility that's offered in the federal fee and  
9 guidelines.

10 So, you know, these are some of the things to  
11 take into account for a different area, but I understand  
12 your concern on how we could address that issue.

13 Yes, sir.

14 STATEMENT BY RON JAEGER

15 MR. JAEGER: Yes, Rob Jaeger with the United  
16 Auburn Indian Community.

17 (Statement inaudible.)

18 MR. LITTLE: Speak louder.

19 MR JAEGER: No, I totally agree, you should be  
20 attending -- staying at Indian facility. I think most  
21 of the tribes, at least the ones that -- (inaudible.)

22 MR. WHITE: Just to hit on the issue of policy  
23 versus regulation, as Commissioner Little said, we're  
24 subject to federal procurement laws, and they're  
25 extremely complicated and will get you into a lot of

1 trouble very quickly. But the golden rule of federal  
2 procurement is lowest cost to government trumps.

3 Now, there are mechanisms to get around that  
4 rule. There are mechanisms that provide for  
5 minority-owned businesses, veteran-owned businesses, and  
6 in the case of Buy Indian, native-owned businesses. As  
7 a matter of policy, we can navigate the federal  
8 procurement system and procure goods and services from  
9 native-owned businesses.

10 It's difficult to do, though. I have a  
11 procurement specialist back in D.C., and basically all  
12 she does all day is deal with procurement issues and  
13 justify to the contracting officers why we want to stay  
14 at a native facility versus a facility down the road.

15 If we have regulations in place, it makes that  
16 process a lot easier for us. You know, going to a  
17 contracting officer with a regulation versus just a  
18 policy makes quite a bit of difference in the  
19 procurement process. And so that's sort of where we're  
20 coming from with the adopting a regulation for Buy  
21 Indian. So I'm just throwing that out there.

22 MR. LITTLE: Thank you, Chris.

23 Are there any other comments on Buy Indian?  
24 Any other comments on any other regulations we've  
25 already gone through? Okay. If not we'll move on to

1 the Class III MICS regulation.

2 The NOI asks several additional questions to  
3 assess the consequences each of the options might have  
4 on the industry. These are: If Class III MICS are no  
5 longer regulations but are changed to guidelines, what,  
6 if any, impact will it have on tribal gaming? If the  
7 Class III MICS are repealed, how would it impact tribal  
8 regulators and operators? If the Class III MICS are  
9 repealed, how would it affect compacts that have  
10 incorporated? If the repeal -- how would it affect  
11 those tribes who have amended their gaming ordinance to  
12 authorize the NIGC to enforce the Class III MICS? And  
13 then how would it affect compacts that recognize federal  
14 oversight of Indian gaming enough to not provide the  
15 states regulating Class III MICS?

16 I know this is obviously an important subject.  
17 Does anyone have any comments they want to start off  
18 with?

19 STATEMENT BY RON JAEGER

20 MR. JAEGER: Ron Jaeger, United Auburn Tribe.  
21 In February 8 we submitted our CRIT comments to  
22 Chairwoman Stevens. For the record today, I just would  
23 like to comment that we support -- our tribe supports  
24 the NIGC continuation of the MICS standard for Class III  
25 gaming, and since '99 it served as a uniform baseline

1 for tribes to issue their own tribal internal control  
2 standards.

3 And in our comments we suggested also that we  
4 had -- our tribe has adopted the federal MICS standards  
5 and a tribal gaming ordinance approved by NIGC, which  
6 concurs regulatory oversight to the NIGC and to enforce  
7 the MICS, and in California our gaming -- in our gaming  
8 compacts a regulation or tribal gaming ordinance and  
9 regulatory procedures. California, at least in our  
10 compact --

11 MR. LITTLE: I'm sorry. Please speak up.

12 MR. JAEGER: -- at least in our compacts -- I'm  
13 sorry. We support -- it's in our compact, we support  
14 the Class III MICS through our ordinance the tribe has  
15 adopted. So we think that the federal Class III MICS  
16 should stay in place, and a review of this would have to  
17 be done with really careful concern as to how we might  
18 change it or how it might impact those that are  
19 operating under the Class III MICS.

20 MR. LITTLE: Thank you.

21 Any others? This is an important issue here.  
22 We've actually put this in Group 1 and Group 5. The  
23 idea is that, you know, we're here to hear what tribes  
24 want to do, whether through those questions that I asked  
25 previously or -- I mean, we can go around the country

1 and you have, like Larry said in the presentation,  
2 (inaudible) tribes to have adopted MICS in their gaming  
3 ordinances, the Class III MICS, you've got compacts,  
4 that's an issue in California.

5 So these aren't questions that you have to  
6 answer right now. If you want to think about them and  
7 submit some written comments at a later date, that will  
8 be fine also.

9 STATEMENT BY ANTHONY BARNES

10 MR. BARNES: Anthony Barnes, Chairman of the  
11 Pala Gaming Commission representing the Pala Band of  
12 Mission Indians. I just want to say that we concur with  
13 everything Ron Jaeger said from United Auburn, that we  
14 are in full support of the NIGC Class III MICS.

15 MR. LITTLE: Thank you, Chairman. Any other  
16 comments? Norm? I know you're just waiting.

17 STATEMENT BY NORM DESROSIERS

18 MR. DESROSIERS: I'm glad you're asking for me  
19 to repeat everything that we've said before. I trust  
20 you read the article in the Indian Gaming magazine,  
21 March issue, on this subject, and I really studied that  
22 CRIT ruling pretty hard before I wrote that article.  
23 One of the points -- I think a critical point -- that I  
24 made is disputing this statement that you have on your  
25 slide that CRIT held that the Commission does not have

1 authority to promulgate regulations establishing Class  
2 III MICS.

3 I didn't see that in the -- I saw you couldn't  
4 promulgate mandatory regulations, I saw you couldn't --  
5 certainly couldn't enforce the regulations, but the  
6 ruling didn't say abolish the regulations that exist.  
7 The ruling, in fact, recognized that you may well have  
8 to do some Class III MICS for tribes that might be  
9 operating without a compact or under sectarian  
10 procedures. So I know that there's an -- and I  
11 certainly know that not all tribes agree with this  
12 position, and I know that there historically has been a  
13 sense at NIGC that this statement is very (inaudible).

14 So one of things I'm trying to do in that  
15 article is to give you guys a way out, give you a door  
16 and some wiggle room to where you could keep these  
17 regulations inspite of the CRIT ruling. So I hope you  
18 take those points seriously, because I think -- I  
19 believe where there's a will there's a way to do this.  
20 If there isn't a will to do it, then it's easy to  
21 discard it. Thank you.

22 MR. LITTLE: Thank you. Are there any other  
23 comments?

24 STATEMENT BY RON JAEGER

25 MR. JAEGER: Ron Jaeger, United Auburn. I'd

1 just like to add one more comment just so that it shows  
2 the impact I think it would have in California, and that  
3 is if we just passed a new statewide regulation called  
4 CGCC-8 and that regulation incorporates the Class III  
5 MICS. And so you're dealing with 60 tribes in  
6 California -- upward of 60 tribes in California under  
7 that state regulation, and so the impact of any kind of  
8 change would be fairly huge in California.

9 MR. LITTLE: Thank you.

10 STATEMENT BY JOSEPH WEBSTER

11 MR. WEBSTER: Along those lines, I think one of  
12 the concerns, certainly that's been expressed here, is  
13 that you do have some of these tribes that have made use  
14 of the MICS and have incorporated those either in  
15 ordinances or compacts that, frankly, the repercussions,  
16 if the Commission were to repeal the MICS, frankly it's  
17 not clear when you have a compact that specifically  
18 incorporates a particular version (inaudible). The  
19 issue really, it seems to me, goes to keeping the MICS  
20 up to date and making sure that the MICS are adjusted to  
21 accommodate a new technology, new issues that come  
22 about.

23 So I do think this is one area the Commission  
24 does have to be very, very careful about. Although I  
25 think -- whatever else CRIT said, I think one thing that

1 is absolutely clear is it's really up to the tribes  
2 whether the Class III MICS will fly or not.

3 So the CRIT decision really goes to the  
4 Commission's authority to force a tribe to comply with a  
5 Class III MICS, and the Court was very clear that the  
6 Commission doesn't have that authority. So it's really  
7 a question, you know, for each tribe to determine as  
8 part of its compact negotiations or its gaming ordinance  
9 what role it would like for federal standards.

10 So I guess that in looking at this I think  
11 this, the Commission does have to be very careful. I  
12 also do think that certainly there are ways, and we'll  
13 be following up with written comments, to try to  
14 maintain some standard that tribes would have as they --  
15 at least as a guide or as a reference that could be  
16 used.

17 MR. LITTLE: Thank you. Any other comments?

18 We've specifically placed this issue in both  
19 Group 1 and Group 5 so that we can get more information,  
20 more comments. Like I said, feel free to submit  
21 additional comments that you may think about after  
22 today's session.

23 When we do address this in Group 5, we'll have  
24 a better understanding of the issue and what tribes  
25 believe. This is a complicated issue, so we have to

1 travel around the country. In Oklahoma, the comments  
2 are generally sometimes different. And, actually, in  
3 California you've got a major difference of opinion. So  
4 it's a very tough issue, that we want to make sure that  
5 we somehow form a way that we can address it  
6 effectively.

7 Because, Joe, you make some very good comments,  
8 that technology is changing and that, you know, the  
9 issues are out there, and we're going to make sure that  
10 it works for everyone. So I appreciate it. Thank you.

11 Does anyone have any other comments on Class  
12 III?

13 STATEMENT BY NORM DESROSIERS

14 MR. DESROSIERS: Well, looking at your slide on  
15 the structure, I just would comment on -- first, well,  
16 of course, we don't want to see Part 542 repealed. But  
17 I find it interesting that there's an issue there of  
18 tribes who have incorporated Part 542 and their  
19 ordinance would pay a higher annual fee. And I think I  
20 can understand the concept there, but that strikes me as  
21 a little discriminatory. There's a lot of NIGC  
22 regulations that have varying degrees of impact in  
23 enforcement costs. We get into, well this regulation  
24 costs more for this tribe so their fees should be more,  
25 and this regulation costs more to enforce than this

1 tribe so these fees should be more. Let's not -- I  
2 would be very opposed to any notion like that.

3 MR. LITTLE: Your point is well taken. This is  
4 what we've heard from tribes, so that's why it is that  
5 we've had tribes that are in California compacts that  
6 require the same, so these are comments we have heard  
7 from tribes, that we're spending more time there. We  
8 should looking at this stuff. I appreciate that thanks.

9 I don't know if there's any other comments. It  
10 would probably be a good time to take a break. When we  
11 come back, maybe we could come back at 10:45. If  
12 there's no other comments, we'll continue along and see  
13 if there's any other comments when we come back. So  
14 let's break until 10:45.

15 (Recess.)

16 MR. LITTLE: There's a number of issues: the  
17 fees, the Buy Indian act, the obsolete ordinances,  
18 facility license, and then we discussed the Class III  
19 MICS and any efforts to solicit comments on how tribes  
20 feel about the issues.

21 Are there any other comments that anybody would  
22 like to put on the record? It could be on any issue,  
23 not just the Class III, which is the last topic that we  
24 addressed. Maybe the break gave you an opportunity to  
25 think of some ideas or questions that you may want to

1 put forward or comments that you might want to make.

2 We talked about this Group 1 consultation is a  
3 series of, I think, five or six consultations throughout  
4 the country that we're doing. You're more than welcome  
5 to submit any additional written comments to the  
6 Commission at a later date. I know many of you need to  
7 get back and meet with your operations folks or your  
8 council before you put together some written statements,  
9 that's fine. We definitely would appreciate that and  
10 encourage that.

11 Does anyone have any final thoughts?

12 Joe.

13 STATEMENT BY JOSEPH WEBSTER

14 MR. WEBSTER: Just a follow-up question on  
15 process and schedule. In looking ahead as we get past  
16 these first few meetings, a number of meetings have  
17 groups 1, 2, 3 some of them have four groups all being  
18 addressed at the same consultation meeting. I'm just  
19 kind of curious in terms of how that would be  
20 structured. Will those meetings be held separately at  
21 the same location? Is there going to be the idea that  
22 those will be a single group that will just go through  
23 the issues of the Group 1, the Group 2, and so forth?

24 MR. LITTLE: Yes, the latter part of your  
25 comment. When we do the consultations where there's

1 more than one group represented on the agenda, we will  
2 go through all of them in one session. I think -- and I  
3 need to reference the schedule, I think on those  
4 sessions where more than one group is scheduled to  
5 discuss, I think we've scheduled consultation for  
6 multiple days, but we understand it will take longer  
7 especially when we get into the technical standards and  
8 Class II and things like that. There's obviously going  
9 to be a lot more interest as we move further along in  
10 the process, so we'll have a better idea.

11 Like as in the Buy Indian Act, we'll have a  
12 preliminary draft out by then. So, yes, we will be  
13 addressing them concurrently. It will be in one session  
14 when we discuss, all the groups.

15 MR. WEBSTER: Thank you.

16 MR. LITTLE: I don't want to shake anything out  
17 of anybody. If there are no other comments, we can  
18 adjourn early today. There's a nice pool outside. In  
19 walking over there, I was wondering why we didn't have a  
20 table around the pool.

21 I'd hate to close the meeting and then anybody,  
22 you know, really wanting to say anything, so like I  
23 said, feel free to collect your thoughts, get your  
24 councils and submit written comments if you'd like. We  
25 will have the transcript posted on our website, probably

1 in a couple weeks or a week or so. Feel free to review  
2 those.

3 If you'd like some additional follow-up you  
4 want to submit, that would be helpful. Otherwise, if I  
5 don't have any additional comments from the tribal  
6 leaders or our staff, I will close the meeting, if  
7 everybody's in agreement with that.

8 STATEMENT BY CHRIS WHITE

9 MR. WHITE: I just wanted to follow-up on  
10 something Commissioner DesRosiers brought up earlier,  
11 and that's specifically 514. We're very interested in  
12 hearing not just on the substantive changes proposed in  
13 the regulation but also the implementation process. And  
14 so I was happy to hear that Norm is taking that back to  
15 your accountants and having them look at that. Because  
16 implementation is very important to all these regs, but  
17 especially with the regulation, we want to do it in a  
18 manner that's not burdensome to tribes, to turn over to  
19 a new system. So please take this draft policy back to  
20 your accounting departments. Have your comptrollers and  
21 accounts payable folks look at it, and we're really  
22 looking for comments, not just on the proposed draft but  
23 also the implementation of any final rule. Thank you.

24 MR. LITTLE: If there's no other comments, I  
25 just want to once again thank everyone for coming out

1 today. I want to thank the NIGC regional staff who  
2 helped organize a lot of this. I know half of our staff  
3 is in D.C. and the other half is spread throughout the  
4 regional offices, and the regional staff does a great  
5 job on behalf of the Commission, and they're out here  
6 day to day working with the tribes and providing  
7 assistance. So I want to thank them for all their help.

8 And I just want to say thank you on behalf of  
9 the entire Commission, Chairman Stevens and Vice  
10 Chairman Cochran, and we wish you all safe travels back  
11 to your homes.

12 Thank you.

13 (The proceedings were concluded at 10:57 a.m.)

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I, the undersigned, a Certified Shorthand Reporter of the State of California, do hereby certify:

That the foregoing proceedings were taken before me at the time and place herein set forth; that a record of the proceedings was made by me using machine shorthand which was thereafter transcribed under my direction; further, that the foregoing is an accurate transcription thereof.

I further certify that I am neither financially interested in the action nor a relative or employee of any attorney of any of the parties.

IN WITNESS WHEREOF, I have this date subscribed my name.

Dated: \_\_\_\_\_

\_\_\_\_\_  
DENISE A. JONES  
CSR No. 12900

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