



TWENTY-NINE PALMS GAMING COMMISSION

December 5, 2011

National Indian Gaming Commission
1441 L Street, NW, Suite 9100
Washington, DC 20005
Via email: reg.review@NIGC.gov

Re: October 12, 2011 Federal Register Notices

Chairwoman Stevens, Vice-Chairwoman Cochran and Commissioner Little,

The Twenty-Nine Palms Gaming Commission thanks you for the opportunity to comment on the three separate notices published by the National Indian Gaming Commission ("NIGC") on October 12, 2011. In short, the Commission supports the NIGC's proposed action in each of these three Notices.

I. 25 CFR Part 523 – Review and Approval of Existing Ordinances or Resolutions

We support the NIGC's decision to withdraw Part 523 of the agency's regulations. Given that no gaming ordinance or resolution that remains in effect falls within the category covered by this Part, the Commission agrees that there is no longer a need for this regulation.

II. 25 CFR Part 571 – Issuance of Investigative Completion Letters

The Commission supports the NIGC's proposal to send what it calls an "investigation completion letter" in the instances described in the Notice. Our preference, however, would be that this requirement be mandatory rather than discretionary, but still we recognize that this is a step in the right direction.

We note that being the subject of an NIGC investigation can bring with it serious consequences. Investors may be unwilling to loan money, top employees may seek employment elsewhere, and negative publicity can keep patrons away. We are therefore pleased that the NIGC recognizes this fact and is willing to advise those under investigation when the agency's

review is complete. Receipt of such a letter should give comfort that enforcement action is not forthcoming and better enable those involved to plan for the future.

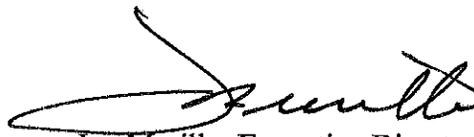
III. Notice of No Action

Finally, the Commission supports the NIGC's decision not to take action on the topics addressed in the "Notice of no action." In particular, we agree with the NIGC's decision not to create a new regulation that would require review and approval of agreements collateral to a management contract. With all due respect, the Commission believes that such an action would have broadened the NIGC's authority beyond that which was intended by IGRA. Accordingly, we agree with the NIGC's decision to abandon this idea.

The Commission is also thankful that the NIGC decided not to define the term "net revenues" for the purpose of calculating management fees. Continuing to rely on the existing definition as it appears in IGRA is an appropriate way in which to proceed.

On behalf of the Twenty-Nine Palms Gaming Commission, I thank you for the opportunity to provide comment on these three Notices. Should you have any questions, please feel free to contact our attorney, Teri Poust, at 323-919-1800, or me.

Sincerely,



Joe Murillo, Executive Director

For

Norm Hansen, Chairman
Twenty-Nine Palms Gaming Commission