



Sycuan Gaming Commission

June 17, 2015

NIGC ATTN: Jonodev Osceola Chaudhuri
c/o Department of the Interior
1849 C Street NW
Mail Stop #1621
Washington DC 20240

Queenette M. Pettiford
Chairwoman

Bernice Hyde
Commissioner

Jamie LaBrake
Commissioner

Antone LaBrake
Commissioner

Yvonne Adkins-Payne
Executive Director

Dear Chairman Chaudhuri,

Thank you for giving Tribes the opportunity to comment on this issue of great importance.

Currently, the Sycuan Gaming Commission utilizes the National Indian Gaming Commission's (NIGC) Section 542. Section 542 is also referenced in our Tribal Gaming Ordinance that was approved by the NIGC. The Sycuan Gaming Commission believes that if the NIGC removes Section 542, the State of California may promulgate further regulations to address what they perceive to be a void, which will further complicate the mandate set forth in California Gambling Control Commission Tribal Regulation Number 8 ("CGCC-8"). Adopted by both the state and tribes, CGCC-8 gives tribes in California the option of demonstrating that tribal casinos are maintaining appropriate controls by forwarding a copy of NIGC's compliance/inspection report to the state. Without Section 542 and resulting NIGC compliance inspections and reports, there is a very real danger that the state would unilaterally amend CGCC-8, citing a lack of assurance that tribal casinos are properly regulated.

In the opinion of the Sycuan Gaming Commission, removal of Section 542 would be bad not only for this Tribe, but would be bad for many other tribes in California that have adopted NIGC compliance to fulfill the mandate set forth in CGCC-8. Section 542 is the time tested standard and the controls outlined within have proven to be effective in assisting tribal gaming agencies statewide in protecting tribal assets. Removing Section 542 would place tribes in California back in the position where we were before CGCC-8, facing a state that insists that tribes subject themselves to additional costly and burdensome regulations.

I would like to respectfully request that Section 542 not be withdrawn.

Thank you for your time and assistance.
Respectfully,

A handwritten signature in black ink, appearing to read "Queenette Pettiford".

Queenette Pettiford, Chairwoman
Sycuan Tribal Gaming Commission