October 29, 2026

Joseph Mathiesen-Powell, Tribal Chairman
Chicken Ranch Rancheria of Me-Wuk Indians of California
9195 Tribal Way
P.O. Box 1159
Jamestown, CA 95327

Re: Chicken Ranch Rancheria of Me-Wuk Indians of California Gaming Ordinance

Dear Chairman Mathiesen-Powell:

I am writing with respect to the July 30, 2026, request of the Chicken Ranch Rancheria of Me-Wuk Indians of California (Tribe) to the National Indian Gaming Commission (NIGC) to review and approve the Tribe's amended gaming ordinance, Ordinance No. 26-07-15-01, adopted by the Tribal Council on July 15, 2026.

Pursuant to the Indian Gaming Regulatory Act (IGRA), the NIGC Chair has 90 days from the date of submission to either approve or disapprove a gaming ordinance.[1] Any gaming ordinance not acted upon at the end of the 90-day period is considered to have been deemed approved by operation of law, but only to the extent such ordinance is consistent with IGRA and NIGC regulations.[2] Because the position of the NIGC Chair is currently vacant, no action was taken by an NIGC Chair within the 90-day period and the gaming ordinance is now deemed approved. In addition, it is my opinion that the amended gaming ordinance is consistent with IGRA and NIGC regulations.

Thank you for providing the amended gaming ordinance for our review. If you have any questions concerning this letter, please contact Senior Attorney Austin Badger at (202) 632-7003.

Sincerely,

Rea Cisneros
General Counsel (Acting)

[1] 25 U.S.C. § 2710(e).
[2] 25 C.F.R. § 522.10.

ORDINANCE NO. 26-07-15-01

AN ORDINANCE OF THE TRIBAL COUNCIL OF THE CHICKEN RANCH RANCHERIA OF ME-WUK INDIANS OF CALIFORNIA REPEALING ORDINANCE 99-07-21-01 AND ITS SUBSEQUENT AMENDMENTS AND ENACTING A NEW ORDINANCE AUTHORIZING AND REGULATING GAMING ACTIVITIES CONDUCTED ON CHICKEN RANCH INDIAN LANDS PURSUANT TO THE INDIAN GAMING REGULATORY ACT

The Tribal Council of the Chicken Ranch of Me-Wuk Indians of California, a federally recognized Indian tribe and sovereign Indian nation, hereby adopts and enacts the following updated and revised tribal gaming ordinance, which ordinance shall supersede and replace Ordinance 99-07-21-01 (as amended) upon approval by the NIGC Chairman in accordance with the Indian Gaming Regulatory Act, and shall henceforth govern the regulation and licensing of gaming activities conducted pursuant to the Indian Gaming Regulatory Act on the Tribe's Indian lands.

Table of Contents to Chicken Ranch Tribal Gaming Ordinance

Section 1. Purpose
Section 2. Applicability
Section 3. Definitions
Section 4. Gaming Activities Authorized
Section 5. Ownership of Gaming Activities
Section 6. Use of Net Gaming Revenues
Section 7. Per Capita Payments
Section 8. Tribal Gaming Commission Established
Section 9. Independence of Tribal Gaming Commission
Section 10 Powers and Duties of the Tribal Gaming Commission
Section 11 Tribal Gaming Commission Organization
Section 12 No Regulatory or Licensing Authority with Respect to Business Activities Conducted in Non-Gaming Space
Section 13 Audits
Section 14. Environment and Public Health and Safety
Section 15. Patron Dispute Resolution
Section 16. Gaming Space Licenses
Section 17. Agent for Service of Process
Section 18. Tribal Access to Financial Information

Section 19. License Application Form Notices
Section 20. License/Permit Fees
Section 21. Background Investigations of Gaming Activities License Applicants
Section 22. Procedures for Conducting Background Investigations of Gaming Activities License Applicants
Section 23. Investigative Reports
Section 24. Gaming Activities License Eligibility Determinations
Section 25. Notice of Results of Background Investigations
Section 26. Granting Gaming Activities Licenses to Gaming Employees
Section 27. Denying Gaming Activities Licenses to Certain Gaming Employees
Section 28. Suspensions and Revocations of Gaming Activities Licenses Issued to Gaming Employees
Section 29. Records Retention for Gaming Employees
Section 30. Gaming Resources Supplier Licenses
Section 31. Submission of a Gaming Resources Supplier Licenses License Application
Section 32. Contents of the Gaming Resources Supplier License Application
Section 33. Background Investigations for Gaming Resources Supplier License Applicants
Section 34. Background Investigation Reports and Records Retention for Gaming Resources Supplier Applicants
Section 35. Gaming Resources Supplier Licensed by Recognized Regulatory Authorities
Section 36. Granting Gaming Resources Supplier Licenses
Section 37. Suspensions and Revocations of Gaming Resources Supplier Licenses
Section 38. Financial Source Licenses
Section 39. Temporary Licenses/Licensing Exemptions
Section 40. Appeals of License Decisions Made by Tribal Gaming Commission
Section 41. Compliance with Federal Law
Section 42. No Interest in Management Contracts by Tribal Officials
Section 43. Tribal Gaming Enterprise
Section 44. Severability of Provisions
Section 45. Duty to Report Theft
Section 46. Amendments
Section 47. Repeal
Section 48. Effective Date

Chicken Ranch Tribal Gaming Ordinance

Section 1. Purpose

The Tribal Council enacts this Tribal Gaming Ordinance to promote tribal economic development, self-sufficiency and sovereignty; to shield the operation of Gaming Activities from organized crime and other corrupting influences; to ensure that Gaming Activities are conducted fairly and honestly by both the operator and players; and to govern the regulation and licensing of Gaming Activities conducted on the Tribe's Indian lands.

Section 2. Applicability

Unless specifically indicated otherwise, all provisions of this Tribal Gaming Ordinance shall apply to all Gaming Activities conducted on the Tribe's Indian lands that constitutes Class II

gaming and Class III gaming authorized under this Tribal Gaming Ordinance and the Secretarial Procedures; but this Tribal Gaming Ordinance shall not apply to Class I gaming.

Section 3. Definitions

Unless specified otherwise herein, the terms used in this Tribal Gaming Ordinance shall have the same meaning and effect as those terms are defined in IGRA and NIGC regulations, if defined therein, and the Secretarial Procedures. If any conflicts arise between the terms as defined by this Tribal Gaming Ordinance and the terms as defined by IGRA and the NIGC regulations, this Tribal Gaming Ordinance shall control.

A. **Directly related to**. "Directly related to" means a spouse, child, parent, grandparent, grandchild, aunt, uncle, or first cousin.

B. **Financial Source**. "Financial Source" means, except for any Person excluded as a financial source under Section 6.4.5 of the Secretarial Procedures, any Person who, directly or indirectly, extends financing in connection with a Gaming Operation and its conduct of Gaming Activities.

C. **Gaming Activities**. "Gaming Activities" means the following activities necessary for the playing of a Class II game or Class III game: (1) the actual playing of a Class II game or Class III game; (2) the use, storage, transportation, and counting of cash, coin, chips, or their equivalents; (3) the use, storage, and maintenance of any books, records, receipts, accounting software, or electronic accounting data pertaining to any Class II game or Class III game; (4) the use, storage, maintenance, or repair of any Gaming Resources or components thereof; (5) the use, storage, maintenance, and repair of any security or surveillance equipment necessary to safeguard the playing of a Class II game or Class III game; and (6) Gaming Employees or Gaming Operation patrons engaging in activities 1 through 5 above.

D. **Gaming Employee**. "Gaming Employee" means any natural person who is an employee of the Gaming Operation and (i) conducts, operates, maintains, repairs, accounts for, or assists in the actual conduct of any Gaming Activities, or is in any way responsible for supervising such Gaming Activities or persons who conduct, operate, maintain, repair, account for, assist, or supervise any such Gaming Activities, (ii) is in a category under federal or tribal gaming law requiring licensing, (iii) is a person whose employment duties require or authorize access to areas of the Gaming Space in which any activities directly related to Gaming Activities are conducted but that are not open to the public, or (iv) is a person whose employment duties require or authorize access to areas of the Gaming Space to perform services for ancillary nongaming activities (i.e. food & beverage, custodial, security) therein while Gaming Activities are conducted. Notwithstanding the foregoing, the definition of Gaming Employee does not include (a) members or employees of the Tribal Gaming Commission; (b) persons employed by the Gaming Operation who have no access to Gaming Operation cash or business records, or who have no involvement in the actual operation of Gaming Activities or whose employment duties do not require or authorize access to areas of the Gaming Space to perform services for ancillary nongaming activities therein; or (c)

any person not included in (a) and (b) above who is engaged in any nongaming activities within a Non-Gaming Space.

E. **Gaming Space**. "Gaming Space" means the designated footprint of delineated physical space within any building or structure complex wherein Gaming Activities are conducted and occur.

F. **Gaming Operation**. "Gaming Operation" means the business enterprise that offers and conducts Gaming Activities exclusively in a Gaming Space but does not include any other governmental or other business activities owned or operated by the Tribe that are not directly related to the playing of a Class II game or Class III game within the Gaming Space.

G. **Gaming Resources**. "Gaming Resources" means any goods or services provided or used in connection with Gaming Activities, whether exclusively or otherwise, including, but not limited to, equipment, furniture, gambling devices/slot machines and ancillary equipment, implements of Gaming Activities such as playing cards and dice, furniture designed primarily for Gaming Activities, maintenance or security equipment and services, and Gaming Activities management and consulting services. "Gaming Resources" does not include professional accounting and legal services.

H. **Gaming Resources Supplier**. "Gaming Resources Supplier" means any Person who, directly or indirectly, does, or is deemed likely to, manufacture, distribute, supply, vend, lease, purvey, or otherwise provide to the Gaming Operation at least twenty-five thousand dollars ($25,000) in Gaming Resources in any twelve (12) month period, or who, directly or indirectly, receives or is deemed likely to receive, in connection with the Gaming Operation, at least twenty-five thousand dollars ($25,000) in any consecutive twelve (12) month period, provided that the Tribal Gaming Commission may exclude a purveyor of equipment or furniture that is not specifically designed for, and is distributed generally for use other than in connection with, Gaming Activities, if the purveyor is not otherwise a Gaming Resources Supplier, the compensation received by the purveyor is not grossly disproportionate to the value of the goods or services provided, and the purveyor is not otherwise a Person who exercises a significant influence over the Gaming Operation.

I. **Indian Gaming Regulatory Act.** "Indian Gaming Regulatory Act" or "IGRA" means the Indian Gaming Regulatory Act, Public Law 100-497, 102 Stat. 2467, codified at 25 U.S.C. §2701, *et seq.*, (as amended, "IGRA"), that was enacted by the U.S. Congress on October 17, 1988, to regulate the conduct of gaming activities on Indian lands.

J. **National Indian Gaming Commission.** "National Indian Gaming Commission" or "NIGC" means the federal regulatory agency with oversight and monitoring responsibility for IGRA gaming activities established under IGRA.

K. **Licensee**. "Licensee" means any Gaming Operation, Gaming Space, Gaming Resources Supplier, Financial Source, or Person required to be licensed by the Tribal Gaming Commission under the provisions of this Tribal Gaming Ordinance.

L. **Non-Gaming Space**. "Non-Gaming Space" means the designated footprint of delineated physical space within any building or structure complex wherein Gaming Activities are not conducted and do not occur, but where nongaming activities happen (i.e. hotel rooms and hotel-related spaces, restaurants, bars and nightclub spaces, retail shops, etc.) even if such spaces are located in areas adjacent to a Gaming Space or co-located within the same building or structure complex as a Gaming Space.

M. **Permit**. "Permit" means, in the event that the Tribal Council chooses to delegate to the Tribal Gaming Commission the authority and responsibility under Tribal law for issuing permission certificates to Persons employed or engaged in activities conducted exclusively within any Non-Gaming Space, the permission certificate issued by the Tribal Gaming Commission allowing the Person to be employed or engaged in activities conducted exclusively within any Non-Gaming Space.

N. **Person**. "Person" means any natural person, organization or entity, including but not limited to corporations, partnerships, and trusts or any group or combination acting as a unit.

O. **Secretarial Procedures**. "Secretarial Procedures" means the "Class III Gaming Secretarial Procedures" issued on January 31, 2024, pursuant to IGRA by the Assistant Secretary of the U.S. Department of the Interior, Indian Affairs for the purpose of regulating Class III gaming activities conducted on the Tribe's Indian lands.

P. **State**. "State" means the State of California.

Q. **Tribal Constitution.** "Tribal Constitution" means the "Constitution of the Chicken Ranch Rancheria of Me-Wuk Indians" which the general membership of the Tribe adopted and established to serve as the governing document of the Tribe on June 9, 2001.

R. **Tribal Council**. "Tribal Council" means the governing body of the Tribe, as set forth in Article V, Section 4 of the Tribal Constitution.

S. **Tribal Gaming Ordinance.** "Tribal Gaming Ordinance" means this tribal gaming ordinance adopted and enacted by the Tribal Council pursuant to its authority under IGRA and Article V, Section 6 of the Tribal Constitution, which grants to the Tribal Council the power to "license and regulate the conduct of all business activities within Tribal jurisdiction" consistent with Federal law, the Tribal Constitution and applicable laws of the Tribe.

T. **Tribal Gaming Commission.** "Tribal Gaming Commission" means the Tribe's tribal gaming regulatory authority established by Section 8 of this Tribal Gaming Ordinance with responsibility to perform regulation of and licensing for Gaming Activities conducted on the Tribe's Indian lands in accordance with this Tribal Gaming Ordinance.

U. **Tribal Member**. "Tribal Member" means any duly enrolled member of the Tribe.

V. **Tribe.** "Tribe" means the Chicken Ranch of Me-Wuk Indians of California, a federally recognized Indian tribe, and sovereign Indian nation possessed with inherent powers of tribal self-government.

Section 4. Gaming Activities Authorized

Class II gaming and Class III gaming are authorized to be conducted on the Tribe's Indian lands, if such gaming is conducted in accordance with this Tribal Gaming Ordinance, and applicable provisions of the Secretarial Procedures, IGRA, NIGC regulations, and any other applicable laws or regulations.

Section 5. Ownership of Gaming Activities

A. The Tribe shall have the sole proprietary interest in, and responsibility for, the conduct of any Gaming Activities authorized by this Tribal Gaming Ordinance, except as expressly provided herein.

B. No Person, other than the Tribe, shall conduct Gaming Activities without obtaining a license from the Tribal Gaming Commission.

C. The Tribal Gaming Commission may issue a license for an individually owned Gaming Operation conducting Gaming Activities so long as:

1. The individually owned Gaming Operations and its Gaming Activities are licensed and regulated pursuant to this Tribal Gaming Ordinance;

2. Not less than sixty percent (60%) of the Net Revenues of the individually owned Gaming Operation is income to the Tribe;

3. The income to the Tribe from an individually owned Gaming Operation is used only for the purposes listed in Section 6 of this Tribal Gaming Ordinance;

4. The owner of the individually owned Gaming Operation pays an annual assessment to NIGC pursuant to 25 C.F.R. § 514.1;

5. The Tribal Gaming Commission applies licensing standards that are at least as restrictive as those established by State law governing similar gaming; and

6. The Tribal Gaming Commission determines that the owner of the individually owned Gaming Operation would be eligible to receive a State license to conduct the same activity within the jurisdiction of the State. State law standards apply with respect to purpose, entity, pot limits and hours of operation.

D. Except as provided for under the terms of an agreement pursuant to the provisions of IGRA or as otherwise permitted by law, all revenues generated from any Gaming Activities are the property of the Tribe. Once Net Revenues from Gaming Activities are transferred from any Gaming Operation accounts and deposited into the Tribe's general treasury account or such other tribal account as the Tribe shall determine, such

funds shall become part of the Tribe's general treasury and lose any identity as Net Revenues from Gaming Activities except to the extent necessary to identify them as such in order to comply with applicable law. No Tribal Member shall be deemed to have any individual or personal interest in such revenues generated from Gaming Activities except in accordance with Section 7 hereof.

Section 6. Use of Net Revenues from Gaming Activities

A. Net Revenues from Gaming Activities shall be used only for the following purposes:

1. To fund Tribal government operations or programs;

2. To provide for the general welfare of the Tribe and its Tribal Members;

3. To promote Tribal economic development;

4. To donate to charitable organizations; or

5. To help fund operations of local government agencies.

Section 7. Per Capita Payments

A. Net Revenues from any Gaming Activities conducted or licensed by the Tribe may be used to make per capita payments to Tribal Members if:

1. The Tribe has prepared a plan to allocate revenues to one or more of the five uses authorized by section 6(A) of this Tribal Gaming Ordinance;

2. The plan is approved by the Secretary as adequate, particularly with respect to the uses described in sections 6(A)(1) and 6(A)(3) of this Tribal Gaming Ordinance;

3. The interests of minors and other legally incompetent persons who are entitled to receive any of the per capita payments are protected and preserved, and the per capita payments are disbursed to the parents or legal guardian of such minors or legal incompetents in such amounts as may be necessary for the health, education, or welfare of the minor or other legally incompetent person; and

4. The per capita payments are subject to federal taxation and the Tribe notifies its Tribal Members of such tax liability when payments are made.

Section 8. Tribal Gaming Commission Established

A. The Tribe hereby establishes a tribal regulatory agency to be known as the "Chicken Ranch Tribal Gaming Agency" ("CRTGA"), acting under the authority of the Tribe, to regulate and license Gaming Activities conducted on the Tribe's Indian lands pursuant to this Tribal Gaming Ordinance and any tribal regulations promulgated

pursuant thereto, IGRA, NIGC regulations, and applicable provisions of the Secretarial Procedures.

B. The Tribal Gaming Commission shall be comprised of three (3) members selected and appointed by the Tribal Council. If reasonably feasible, the Tribal Council shall strive to appoint members who have a minimum of ten (10) years or more of experience in the gaming regulatory/compliance field or Indian gaming industry, with preference given to Tribal Members. Unless otherwise removed during their term of office for good reason pursuant to Section 8G of this Tribal Gaming Ordinance, each member shall serve an initial term of office of three (3) years from the date of their appointment, which initial term shall automatically renew for successive terms of three (3) years unless sixty (60) days before the expiration of the initial term or any successive term the Tribal Council decides by majority vote to end the member's service at the conclusion of their then current term.

C. Within seventy-five (75) days of this Tribal Gaming Ordinance becoming effective under IGRA, the Tribal Council shall take action to establish staggered terms for each Tribal Gaming Commissioner by designating a one (1) year initial term for one member, a two (2) year initial term for a second member and a three (3) year initial term for the third member and declaring the start date of these staggered terms.

D. The following individuals are not eligible to serve as members of the Tribal Gaming Commission:

1. Tribal Council members, while serving in this capacity;

2. Current Gaming Employees;

3. Gaming Activities related contractors (including any principal of a Gaming Resources Supplier);

4. Persons directly related to, or sharing a residence with, any of the above; and

5. Persons ineligible to be key employees or primary management officials of a Gaming Operation.

E. Non-Tribal Members previously convicted of any felony or misdemeanor offense of embezzlement, theft, or any other money-related or honesty-related misdemeanor offense, such as fraud, cannot serve as a member of the Tribal Gaming Commission. Tribal members previously convicted of any felony or misdemeanor offense of embezzlement, theft, or any other offense related to money or honesty, such as fraud, will only be allowed to serve as a member of the Tribal Gaming Commission Commissioner if the Tribal Council specifically finds that a significant amount of time has passed, and the Person is now of trustworthy character.

F. The Tribal Council shall require a criminal history check with appropriate law enforcement agencies for each individual under consideration for appointment to be a member of the Tribal Gaming Commission; shall review the individual's criminal history check results; if otherwise required by IGRA and this Tribal Gaming Ordinance, conduct a background investigation of the individual consistent with Sections 21 and 22 of this Tribal Gaming Ordinance; and shall make an appropriate determination that the individual would be eligible to be granted a Gaming Activities license before appointing the individual to be a member of the Tribal Gaming Commission.

G. Except as otherwise provided in Section 8B, members of the Tribal Gaming Commission may only be removed from office by the Tribal Council for good reason on the following grounds: extensive neglect of duty, substantial misconduct, manifest malfeasance, or other acts that would render such persons unqualified for their position or for licensure hereunder. An affirmative vote of at least three (3) members of the Tribal Council, taken in an open meeting after a duly noticed hearing at which the member charged with one of the grounds for removal shall have the right to hear and present evidence concerning their removal, shall be required to remove a member of the Tribal Gaming Commission. At the request of the member whose removal is at issue, the hearing may be held in executive session. The Tribal Council also may elect to receive in executive session any evidence, public disclosure of which might compromise any ongoing law enforcement investigation, land acquisition for the Tribe, or negotiations by the Tribe with a third party. Any allegations of extensive neglect of duty, substantial misconduct, manifest malfeasance, or other acts that would render the member unqualified for their position must be substantiated by a preponderance of the evidence (that is, more likely than not). A member shall be given a reasonable opportunity to provide evidence rebutting the grounds for their removal before the removal is final.

Section 9. Independence of Tribal Gaming Commission

A. The Tribal Council recognizes the importance of an independent Tribal Gaming Commission in maintaining well-regulated Gaming Activities. The Tribal Gaming Commission shall be independent of, and act independently and autonomously, from, the Tribal Council in all matters within its purview. No prior, or subsequent, review by the Tribal Council of any actions of the Tribal Gaming Commission shall be required or permitted except as otherwise explicitly provided in this Tribal Gaming Ordinance. To avoid potential conflicts of interest with respect to regulation and licensing of Gaming Activities, it is required that, at a minimum:

1. No member of the Tribal Council or Gaming Employee of a Gaming Operation may serve on the Tribal Gaming Commission;

2. No Person directly related to, or living with, any Tribal Council member or Gaming Employee of a Gaming Operation may serve on the Tribal Gaming Commission;

3. Members of the Tribal Gaming Commission are prohibited from engaging in any Gaming Activities;

4. Members of the Tribal Gaming Commission are prohibited from accepting complimentary items from a Gaming Operation, excepting food and beverages valued under fifty dollars ($50.00); and

5. Except as otherwise provided in Section 8B, members of the Tribal Gaming Commission may only be removed from office by the Tribal Council prior to the expiration of their respective terms for extensive neglect of duty, substantial misconduct, manifest malfeasance or other acts that would render a member unqualified for the position.

Section 10. Powers and Duties of the Tribal Gaming Commission

A. The Tribal Commission will conduct regulatory oversight to ensure compliance with this Tribal Gaming Ordinance and any tribal regulations promulgated pursuant thereto, IGRA, NIGC regulations, applicable provisions of the Secretarial Procedures, and, if applicable, State laws and regulations. The Tribal Gaming Commission will serve as the licensing authority with respect to Gaming Activities conducted on the Tribe's Indian lands and will administer background investigations as part of the licensing process. The Tribal Gaming Commission will also have a role in monitoring compliance with the Gaming Operation's internal controls and in tracking gaming revenues. In order to carry out its regulatory duties, the Tribal Gaming Commission shall have unrestricted access to all areas of the Gaming Space and to all of the Gaming Operation records. The Tribal Gaming Commission shall have authority to take enforcement actions, including suspension or revocation of any license to be issued under this Tribal Gaming Ordinance, when appropriate.

B. The Tribal Gaming Commission shall have the following specific powers and duties to carry out its responsibilities under this Tribal Gaming Ordinance and IGRA:

1. Conduct background investigations, or cause such investigations to be conducted, for any Gaming Employee (including primary management officials and key employees) of any Gaming Operation, Gaming Resources Suppliers, or Financial Source;

2. Review and approve all investigative work conducted in connection with the background investigations of any applicant requesting a license to a Gaming Employee (including primary management officials and key employees) of any Gaming Operation, Gaming Resources Suppliers, or Financial Source;

3. Create and maintain investigative reports based on the background investigations of any Gaming Employee (including primary management

officials and key employees) of any Gaming Operation, Gaming Resources Suppliers, or Financial Source;

4. Designate a law enforcement agency to obtain and process fingerprints and conduct a criminal history check that shall include a check of criminal history records information maintained by the Federal Bureau of Investigation;

5. Make written licensing eligibility determinations, which shall be signed by the Chairperson of the Tribal Gaming Commission, and which include specific findings of fact supporting the decision;

6. Submit a "notice of results" to the NIGC of the background investigations done for each license applicant for a primary management official and key employee position;

7. Issue Gaming Activities licenses to a Gaming Employee (including primary management officials and key employees) of any Gaming Operation, if warranted by the eligibility determination;

8. Establish standards for and issue Gaming Space Licenses for each Gaming Space;

9. Inspect, examine and monitor all of Gaming Activities, and have immediate access to review, inspect, examine, photocopy and audit all records of a Gaming Operation;

10. Ensure compliance with all applicable laws of the Tribe, applicable federal laws and applicable State laws, rules and regulations regarding gaming activities conducted pursuant to IGRA;

11. Investigate any suspicion of wrongdoing associated with any Gaming Activities;

12. Hold hearings on complaints made by a patron of a Gaming Operation, in accordance with procedures established in this Tribal Gaming Ordinance, the Secretarial Procedures and the Tribe's laws;

13. Comply with any reporting requirements under IGRA, the NIGC regulations, the Secretarial Procedures, and any other applicable law;

14. Promulgate and issue regulations necessary to comply with applicable internal control standards;

15. Promulgate and issue regulations on the levying of fees and/or taxes associated with the Tribal Gaming Commission's licensing process for any Gaming Activities-related license application;

16. Promulgate and issue regulations on the levying of fines and/or the suspension or revocation of any licenses issued by the Tribal Gaming Commission for violations of this Tribal Gaming Ordinance, the Secretarial Procedures, or any other applicable regulations;

17. Establish a list of Persons not allowed to participate in Gaming Activities conducted on the Tribe's Indian lands in order to maintain the integrity of any Gaming Operation;

18. Establish a list of Persons who have voluntarily agreed to be excluded from participating in Gaming Activities conducted on the Tribe's Indian lands, and create regulations for enforcing the exclusions;

19. Provide referrals and information to the appropriate law enforcement officials when such information indicates a violation of Tribal, federal or State statutes, ordinances, regulations, codes or resolutions;

20. Create a list of regulatory authorities that conduct background investigations of, and licenses, vendors who are recognized as trustworthy;

21. Promulgate regulations for exempting Gaming Resources Suppliers from the licensing and/or background investigation requirements if they have received a license from a recognized gaming regulatory authority;

22. Perform such other duties the Tribal Gaming Commission deems appropriate for the proper regulation of Gaming Activities conducted on the Tribe's Indian lands;

23. Promulgate such regulations, standards, and guidelines as deemed appropriate by the Tribal Gaming Commission to implement the provisions of this Tribal Gaming Ordinance, so long as they are in furtherance of, and not in conflict with, any provisions of this Tribal Gaming Ordinance; and

24. Subject to approval of the Tribal Council and the appropriation of budget funds therefor, employ such staff as may be reasonably required to fulfill the Tribal Gaming Commission's responsibilities under this Tribal Gaming Ordinance; provided compensation of employees of the Tribal Gaming Commission shall be limited to that which is comparable to compensation paid to persons performing similar duties in other governmental gaming regulatory agencies; *provided* no Person may be employed by the Tribal Gaming Commission as part of the staff unless the Person is first subject to a background investigation consistent with Sections 21 and 22 of this Tribal Gaming Ordinance and the Tribal Gaming Commission determines the individual would be eligible to be granted a Gaming Activities license.

25. Provided the Tribal Council has delegated to the Tribal Gaming Commission the authority and responsibility under Tribal law for issuing permission certificates to Persons employed or engaged in activities

conducted solely within Non-Gaming Space, establish standards and promulgate regulations for issuing Permits, subject to review and approval by the Tribal Council; *provided* such Persons are not to be subject to (i) the same level of scrutiny as an applicant for a Gaming Activities license or (ii) the requirements of Sections 21 and 22 of this Tribal Gaming Ordinance.

C. Before adopting, amending and repealing regulations, the Tribal Gaming Commission shall give notice of any such proposed action to the Tribal Council, any Gaming Operation, and all other Persons whom the Tribal Gaming Commission has reason to believe have a legitimate interest in the proposed action. The notice shall invite comments and describe the general nature of the proposed action and the manner in which comments on the proposed action are to be received by the Tribal Gaming Commission.

D. The Tribal Gaming Commission shall ensure that all records and information obtained as a result of a license related background investigation, including, but not limited to, the identity of each Person interviewed in the course of an investigation, shall remain confidential and shall not be disclosed to any Persons who are not directly involved in the licensing process. Information obtained during the course of a background investigation shall be disclosed to members of management, human resource personnel and/or others employed by a Gaming Operation on a need-to-know basis, for actions to be taken in their official capacities.

E. The confidentiality requirements in Section 10D above do not apply to requests for such records or information from any Tribal, federal or any state law enforcement or regulatory agency, or for the use of such records or information by the Tribal Gaming Commission and its licensing staff in the performance of their official duties.

Section 11. Tribal Gaming Commission Organization

A. At the first meeting of the Tribal Gaming Commission held each January, the members of the Tribal Gaming Commission shall select from its members, by majority vote, a Chairperson, Vice-Chairperson and Secretary. Members will hold their office until the first meeting of the Tribal Gaming Commission held the next January. If a member is newly appointed by the Tribal Council before the first meeting of the Tribal Gaming Commission held the next January, the members of the Tribal Gaming Commission shall select from its members, by majority vote, a Chairperson, Vice-Chairperson and Secretary, who shall serve in those offices until the first meeting of the Tribal Gaming Commission held the next January. The Chairperson shall preside over meetings of the Tribal Gaming Commission, and the Vice-Chairperson shall preside in the absence of the Chairperson. The Secretary shall record in writing the minutes of all Tribal Gaming Commission meetings and all official actions taken by the Tribal Gaming Commission. The Tribal Gaming Commission shall keep a written record of all of its meetings.

B. Meetings of the Tribal Gaming Commission shall be held at least once per month, at the Tribal Gaming Commission office or other location within the Tribe's Indian

lands chosen by the members of the Tribal Gaming Commission, at a time determined by the members. Additional meetings may be held as called by the Chairperson of the Tribal Gaming Commission or by at least two (2) other members.

C. Notice of meetings shall be made to each member with three (3) days' advance notice served by electronic or other written communication. Text messages may be an acceptable form of advance notice provided that the recipient of a request for a special meeting sent via text message acknowledges receipt of the request in a written communication, including but not limited to acknowledgement via text message. Meetings may be called at any time, by any means, with unanimous consent of the members. Whenever any notice is required to be given to any members under the provisions of this Tribal Gaming Ordinance, attendance of a member at a meeting will constitute a waiver of notice of such meeting, except where a member attends a meeting for the sole purpose of objecting to the transaction of any business because the meeting is not properly called or convened.

D. Meetings of the Tribal Gaming Commission and any subcommittees established thereby are required to adhere to Robert's Rules of Order to ensure meetings are conducted in an organized, fair, and efficient manner. This includes, but is not limited to, establishing clear procedures for motions, debates, and voting; maintaining proper decorum; ensuring equal participation; and following a structured agenda to promote transparency and accountability in decision-making.

E. The Tribal Gaming Commission may convene in executive (closed) session when its members are deciding or considering matters of a sensitive nature where disclosure could reasonably potentially harm the well-being of the Tribe, a Tribal member, or a Licensee. The decision to retire to executive session must be by majority vote or consensus of the members present at a meeting and for a specific reason stated at the time the decision to retire is voted on.

F. Two (2) members of the Tribal Gaming Commission shall constitute a quorum for conducting business. The concurrence of a majority of the members upon motion made and approved shall be required for any final determination or action by the Tribal Gaming Commission. All members may vote on any issue. The Tribal Gaming Commission may act in its official capacity, even if there are vacancies on the Tribal Gaming Commission. The Tribal Gaming Commission may permit any or all members to participate in a meeting through the use of any means of communication by which all members participating may simultaneously hear each other during the meeting, including, but not limited to, telephones and video conferencing devices. A member participating in a meeting by such means shall be deemed present at the meeting.

G. The Tribal Council shall determine and authorize the compensation to be paid to the members of the Tribal Gaming Commission at a level based on a determination of time required to be expended for members' duties and the qualifications of the appointed member. In order to ensure the Tribal Gaming Commission is not

improperly influenced, a member's compensation shall not be based on a percentage of gaming revenue.

H. On or before April 30 of each year, the Tribal Gaming Commission shall provide to the Tribal Council an Annual Report summarizing its activities during the prior twelve (12) month period ending on December 31, and accounting for all receipts and disbursements. The Tribal Council shall cause copies of the Annual Report to be made available to Tribal Members within thirty (30) days after receipt.

Section 12. Regulatory or Licensing Authority with Respect to Business Activities Conducted in Non-Gaming Space

The Tribal Council recognizes that the primary purpose of the Tribal Gaming Commission is to regulate Gaming Activities in accordance with this Tribal Gaming Ordinance and applicable Tribal and federal law. The Tribal Council further recognizes that certain non-gaming enterprises, facilities, activities, employees, contractors, and operations may affect the integrity, security, reputation, financial stability, or effective operation of any Gaming Operation.

Accordingly, the Tribal Council may, by ordinance, resolution, policy, permit requirement, or other official action, delegate to the Tribal Gaming Commission such regulatory, licensing, permitting, compliance, investigative, auditing, monitoring, inspection, or enforcement authority over non-gaming enterprises, facilities, activities, employees, contractors, or operations as the Tribal Council determines to be in the best interests of the Tribe, including with respect to those business activities conducted in Non-Gaming Space. Such authority may extend to any Tribal enterprise, facility, activity, employee, contractor, vendor, or operation designated by the Tribal Council.

Except as otherwise expressly delegated by the Tribal Council Commission pursuant to this Section 12, the Tribal Gaming Commission shall exercise only those powers and duties granted under this Tribal Gaming Ordinance and applicable law. Any authority delegated to the Tribal Gaming Commission pursuant to this Section 12, including with respect to business activities conducted in Non-Gaming Space, may be modified, expanded, limited, or revoked by the Tribal Council at any time.

Section 13. Audits

A. The Tribal Gaming Commission shall require and cause to be conducted the performance of independent audits of each licensed Gaming Operation annually and shall submit the results of those audits to the NIGC.

B. Annual audits shall be performed by a certified public accountant, licensed by a state board of accountancy and audits shall conform to generally accepted auditing standards.

C. All Gaming Operation-related contracts that result in the purchase of supplies, services or concessions for more than $25,000 in any year (except contracts for professional legal and accounting services) shall be specifically included within the scope of the audit conducted under Section 13(A) of this Tribal Gaming Ordinance.

D. Copies of the annual audit of each licensed Gaming Operation, and each audit for supplies, services or concessions of each Gaming Operation, shall be furnished to the NIGC within 120 days after the end of each fiscal year of the Gaming Operation.

Section 14. Environment and Public Health and Safety

A. Each Gaming Space, and the Gaming Activities conducted therein, shall be constructed, maintained, and operated in a manner that adequately protects the environment and the health and safety of the public.

B. The Tribal Gaming Commission shall identify and enforce laws, resolutions, codes, policies, standards, or procedures, which are applicable to each Gaming Space, and the Gaming Activities conducted therein, to ensure adequate protection of the environment and the health and safety of the public.
and safety of the public.

Section 15. Patron Dispute Resolution

The Tribal Gaming Commission shall promulgate regulations consistent with fairness and prevailing industry standards governing patron disputes over the play or operation of any Class II game or Class III game, including any refusal to pay to a patron any alleged winnings from any Gaming Activities. The patron dispute regulations shall meet the minimum standards contained in Section 10 of the Secretarial Procedures. Consistent with applicable law of the Tribe, the Tribal Gaming Commission shall also promulgate regulations governing disputes over any patron tort claims arising from incidents happening within any Gaming Space.

Section 16. Gaming Space Licenses

A. The Tribal Gaming Commission is required to issue a separate license to each place, facility or location (i.e. each Gaming Space) wherein a Gaming Operation conducts Gaming Activities under this Tribal Gaming Ordinance.

B. The Tribal Gaming Commission is responsible for promptly issuing new or renewed Gaming Space licenses to a Gaming Operation for each Gaming Space wherein it conducts Gaming Activities under this Tribal Gaming Ordinance.

C. The Tribal Gaming Commission shall require that a Gaming Space license application be completed by the chief primary management official of the Gaming Operation for each Gaming Space wherein the Gaming Operation conducts Gaming Activities under this Tribal Gaming Ordinance, and each Gaming Space license application shall include a legible diagram map clearly identifying the precise designated footprint of delineated physical space within any building or structure complex wherein Gaming Activities are conducted and occur.

D. The Tribal Gaming Commission shall identify the environmental and public health and safety standards with which the Gaming Operation must comply for the Gaming Space, and specify the form, conditions, and content of the Gaming Space

license application. The license application for a Gaming Space shall include: (i) a legal description of the Tribe's Indian lands upon which the Gaming Space is located, and (ii) a certification that the Gaming Space site constitutes "Indian lands" of the Tribe under IGRA.

E. The Tribal Gaming Commission shall only issue a Gaming Space license for a Gaming Space if the application includes the required information and documentation, and sufficiently satisfies any additional conditions deemed necessary by the Tribal Gaming Commission.

F. The Tribal Gaming Commission shall submit to the NIGC Chairman a notice that issuance of a Gaming Space license for a Gaming Space is under consideration by the Tribal Gaming Commission. This notice must be submitted at least 120 days before the opening of any new Gaming Space wherein a Gaming Operation conducts Gaming Activities under this Tribal Gaming Ordinance.

G. The Tribal Gaming Commission shall submit a copy of each newly issued or renewed Gaming Space license to the NIGC Chairman within thirty (30) days of issuance, along with any other required documentation. Along with submitting a copy of the Gaming Space license, the Tribal Gaming Commission will also submit an attestation certifying that by issuing the Gaming Space license the Tribal Gaming Commission has determined that the construction and maintenance of the Gaming Space, and the operation of Gaming Activities therein, is conducted in a manner that adequately protects the environment and the health and safety of the public.

H. The Tribal Gaming Commission shall notify the NIGC Chairman within thirty (30) days if a Gaming Space license for a Gaming Space is terminated or expires, or if a Gaming Space closes or reopens, except that notification is not required for seasonal closures or temporary closures with a duration of less than 180 days.

I. Each Gaming Space License shall be reviewed and renewed every two (2) years.

Section 17. Agent for Service of Process

The Tribal Gaming Commission shall designate its Chairperson as the agent for service of any official determination, order, or notice of violation to be issued under IGRA and NIGC regulations.

Section 18. Tribal Access to Financial Information

A copy of each Gaming Operation's annual audit will be made available for review, upon request, to Tribal Members.

Section 19. License Application Form Notices

A. The following notice shall be placed on the Tribal Gaming Commission approved license application form for each applicant requesting a Gaming Activities license

to be a Gaming Employee for a Gaming Operation (including primary management officials and key employees) before it is filled out by an applicant:

In compliance with the Privacy Act of 1974, the following information is provided: Solicitation of the information on this form is authorized by 25 U.S.C.§§ 2701 *et seq.* The purpose of the requested information is to determine the eligibility of individuals to be granted a gaming license. The information will be used by the Tribal gaming regulatory authorities and by the National Indian Gaming Commission members and staff who have need for the information in the performance of their official duties. The information may be disclosed by the Tribe or the NIGC to appropriate Federal, Tribal, State, local or foreign law enforcement and regulatory agencies when relevant to civil, criminal or regulatory investigations or prosecutions or when pursuant to a requirement by a tribe or the NIGC in connection with the issuance, denial, or revocation of a gaming license, or investigations of activities while associated with a tribe or a gaming operation. Failure to consent to the disclosures indicated in this notice will result in a tribe being unable to license you for a primary management official or key employee position.

The disclosure of your Social Security Number (SSN) is voluntary. However, failure to supply a SSN may result in errors in processing your application.

B. The following additional notice shall be placed on the Tribal Gaming Commission approved application form for each applicant requesting a Gaming Activities license to be a Gaming Employee for a Gaming Operation (including primary management officials and key employees) before it is filled out by an applicant:

A false statement on any part of your license application may be grounds for denying a license or the suspension or revocation of a license. Also, you may be punished by fine or imprisonment (U.S. Code, title 18, section 1001).

Section 20. License/Permit Fees

Subject to review and approval of the Tribal Council, the Tribal Gaming Commission is authorized to annually establish and impose license and permit fees for Licensees and permittees as may be necessary to fully reimburse the Tribal Gaming Commission for its actual costs associated with the processing of license and permit applications and fulfilling its regulatory responsibilities under this Tribal Gaming Ordinance. All such fees shall be collected by the Tribal Gaming Commission and are hereby continuously appropriated solely for the purposes set forth in this Section 20.

Section 21. Background Investigations of Gaming Activities License Applicants

A. The Tribal Gaming Commission shall perform a background investigation for each applicant requesting a Gaming Activities license to be a Gaming Employee for a Gaming Operation (including primary management officials and key employees). The investigation must be sufficient to allow the Tribal Gaming Commission to

make an eligibility determination under Section 24 of this Tribal Gaming Ordinance.

B. The Tribal Gaming Commission is responsible for promptly conducting the background investigations of each applicant requesting a Gaming Activities license to be a Gaming Employee for a Gaming Operation (including primary management officials and key employees) following submission of a Tribal Gaming Commission-approved license application form by the applicant. The background investigation shall include a check of criminal history records information maintained by the Federal Bureau of Investigation.

C. The Tribal Gaming Commission shall request fingerprints from each applicant requesting a Gaming Activities license to be a Gaming Employee for a Gaming Operation (including primary management officials and key employees), and shall by resolution designate the specific law enforcement agency to take the fingerprints.

D. The Tribal Gaming Commission shall request from each applicant requesting a Gaming Activities license to be a Gaming Employee for a Gaming Operation (including primary management officials and key employees) all of the following information:

1. Full name, other names used (oral or written), Social Security number, birth date, place of birth, citizenship, gender, and all languages (spoken and/or written);

2. Currently, and for the previous five (5) years, any business and employment positions held, ownership interests in those businesses, business and residential addresses, and driver's license numbers;

3. The names and current addresses of at least three (3) personal references, including one (1) personal reference who was acquainted with the applicant during each period of residence listed under paragraph (D)(2) of this Section 21D;

4. Current business and residential telephone numbers, and all cell phone numbers;

5. A description of any existing and previous business relationships with other tribes, including any ownership interests in those businesses;

6. A description of any existing and previous business relationships with the gaming industry generally, including ownership interests in those businesses;

7. The name and address of any licensing or regulatory agency with which the applicant has filed an application for a license or permit related to gaming activities, whether or not such license or permit was granted;

8. For each felony for which there is an ongoing prosecution or a conviction, the charge, the name and address of the court involved, and the date of disposition, if any;

9. For each misdemeanor conviction or ongoing misdemeanor prosecution (excluding minor traffic violations) within 10 years of the date of the application, the name and address of the court involved and the date of disposition, if any;

10. For each criminal charge (excluding minor traffic charges), whether or not there is a conviction, if such criminal charge is within 10 years of the date of the application, and is not otherwise listed pursuant to paragraphs (D)(8) or (D)(9) of this Section 21D, the criminal charge, the name and address of the court involved, and the date of disposition, if any;

11. The name and address of any licensing or regulatory agency with which the applicant has filed an application for an occupational license or permit, whether or not such license or permit was granted;

12. A photograph;

13. Any other information the Tribal Gaming Commission reasonably deems relevant; and

14. Fingerprints obtained in accordance with procedures adopted by the Tribal Gaming Commission, consistent with NIGC regulations.

E. When an applicant requesting a Gaming Activities license to be a Gaming Employee for a Gaming Operation (including primary management officials and key employees) becomes employed by a Gaming Operation, a complete application file, containing all of the information listed in Section 21(D), shall be maintained.

F. The Tribal Gaming Commission and its investigators shall keep confidential the identity of each Person interviewed in the course of conducting a background investigation.

Section 22. Procedures for Conducting Background Investigations of Gaming Activities License Applicants

A. The Tribal Gaming Commission, or its agent, shall employ or engage an investigator to conduct a background investigation of each applicant requesting a Gaming Activities license to be a Gaming Employee for a Gaming Operation (including primary management officials and key employees). The Tribal Gaming Commission may employ all reasonable means, including the engagement of outside services and investigators and the holding of hearings, to acquire the information necessary to determine whether or not a license should be issued. Applicants shall also agree to release the information necessary in order for the

Tribal Gaming Commission to achieve its goals under this Tribal Gaming Ordinance and to furnish such information to the NIGC or such other gaming regulatory agency as may be required by law.

B. In conducting the background investigation, the investigator shall:

1. Verify the applicant's identity through items such as a Social Security card, driver's license, birth certificate or passport;

2. Contact each personal and business reference provided in the license application, when possible;

3. Conduct a personal credit check;

4. Conduct a civil history records check;

5. Conduct a criminal history records check;

6. Based on the results of the criminal history records check, as well as information acquired from an applicant's self-reporting or from any other source, obtain information from the appropriate court regarding any past felony and/or misdemeanor convictions or ongoing prosecutions within the past ten (10) years;

7. Inquire into any previous or existing business relationships with the gaming industry, including with any tribes with gaming operations, by contacting the entities or tribes;

8. Verify the applicant's history and current status with any licensing agency by contacting the agency; and

9. Take other appropriate steps to verify the accuracy of the information, focusing on any problem areas noted.

Section 23. Investigative Reports

A. The Tribal Gaming Commission shall create and maintain an investigative report, in either physical or digital format as applicable law and regulations permit, for each background investigation of each applicant requesting a Gaming Activities license to be a Gaming Employee for a Gaming Operation (including primary management officials and key employees).

B. Investigative reports shall include all of the following information:

1. Steps taken in conducting the investigation;

2. Results obtained;

3. Conclusions reached; and

4. The basis for those conclusions.

Section 24. Gaming Activities License Eligibility Determinations

A. No individual may be employed by a Gaming Operation unless they have requested, obtained and maintain a Gaming Activities license to be a Gaming Employee for a Gaming Operation (including primary management officials and key employees).

B. Before issuing a Gaming Activities license to an applicant requesting a Gaming Activities license to be a Gaming Employee for a Gaming Operation (including primary management officials and key employees), the Tribal Gaming Commission shall review the applicant's prior activities, criminal record, if any, reputation, habits, and associations, and make a determination whether issuing a Gaming Activities license to that individual will undermine public trust that the Gaming Operation is free from criminal and dishonest elements and will be conducted honestly.

C. The standard to be applied by the Tribal Gaming Commission in determining eligibility for issuing a license to an applicant requesting a Gaming Activities license to be a Gaming Employee for a Gaming Operation (including primary management officials and key employees) is whether, based on all the information and documents submitted to the Tribal gaming Commission, (i) the individual, is shown to be a person of good character, honesty, and integrity, (ii) the individual's prior activities, criminal record, if any, reputation, habits, and associations do not pose a threat to the public interest or to the effective regulation of Gaming Activities, or creates or enhances the dangers of unsuitable, unfair, or illegal practices, methods, or activities in the conduct of Gaming Activities, and (iii) the individual is in all other respects qualified to be licensed under applicable provisions of this Tribal Gaming Ordinance, IGRA, NIGC regulations and the Secretarial Procedures.

D. If the Tribal Gaming Commission, in applying the eligibility standards adopted in this Tribal Gaming Ordinance, determines that an applicant requesting a Gaming Activities license to be a Gaming Employee for a Gaming Operation (including primary management officials and key employees) does not meet all three license eligibility standards criteria described in Section 24C above, the individual shall not be eligible to be granted a Gaming Activities license with respect to employment by a Gaming Operation and the Tribal Gaming Commission shall not issue a license that to individual with respect to employment by a Gaming Operation.

E. Copies of each applicant's eligibility determination shall be included with the notice of results that must be submitted to the NIGC before issuing a license to an applicant for a primary management official or key employee position.

Section 25. Notice of Results of Background Investigations of Certain Gaming Activities License Applicants

A. Before issuing a license to an applicant for a primary management official or key employee position, the Tribal Gaming Commission shall prepare a "notice of results" of the applicant's background investigation to submit to the NIGC.

B. The "notice of results" must be submitted to the NIGC no later than sixty (60) days after the applicant begins working for a Gaming Operation.

C. The "notice of results" shall include the following information:

1. The applicant's name, date of birth, and social security number;

2. The date on which the applicant began working or will begin working as a primary management official or key employee for a Gaming Operation;

3. A summary of the information presented in the investigative report, including:

a. licenses that have previously been denied;
b. gaming licenses that have been revoked, even if subsequently reinstated;
c. every known criminal charge brought against the applicant within the last ten (10) years of the date of the application; and
d. every felony offense of which the applicant has been convicted or any ongoing prosecution; and

4. A copy of the eligibility determination made in accordance with Section 24.

Section 26. Granting Gaming Activities Licenses to Gaming Employees

A. Each Gaming Employee of a Gaming Operation (including primary management officials and key employees) must have a Gaming Activities license issued by the Tribal Gaming Commission.

B. The Tribal Gaming Commission is responsible for promptly granting and issuing a Gaming Activities license to any applicant requesting a Gaming Activities license to be a Gaming Employee for a Gaming Operation (including primary management officials and key employees).

C. A Gaming Activities license may not be granted to an applicant if the Tribal Gaming Commission reasonably determines the applicant's license application is incomplete or deficient, after giving the applicant reasonable time to cure the deficiencies identified by the Tribal Gaming Commission.

D. A Gaming Activities license issued under this Tribal Gaming Ordinance shall be reviewed and renewed at least every two (2) years for continuing compliance. In

connection with that review, the Tribal Gaming Commission shall require the Licensee to update all information provided in the Licensee's previous application. For the purposes of this section, the review process shall be deemed to constitute an application for license renewal subject to the eligibility standards adopted in this Tribal Gaming Ordinance.

E. The Tribal Gaming Commission may issue a Gaming Activities license to an applicant for a primary management official or key employee position after submitting a "notice of results" of the applicant's background investigation to the NIGC, as required by Section 25.

F. The Tribal Gaming Commission shall notify the NIGC of the issuance of a Gaming Activities license to an applicant for a primary management official or key employee position within thirty (30) days of issuance.

G. A Gaming Operation shall not employ an individual in a primary management official or key employee position who does not have an active Gaming Activities license after ninety (90) days of beginning work at the Gaming Operation.

H. The Tribal Gaming Commission must reconsider a Gaming Activities license application by an applicant for a primary management official or key employee position if the Tribal Gaming Commission receives a statement of itemized objections to issuing such a license from the NIGC, and those objections are received within thirty (30) days of the NIGC receiving a "notice of results" of the applicant's background investigation.

I. The Tribal Gaming Commission shall take the NIGC's objections into account when reconsidering a Gaming Activities license application for a primary management official or key employee position.

J. The Tribal Gaming Commission will make the final decision concerning whether to issue a Gaming Activities license to an applicant for a primary management official or key employee position.

K. If the Tribal Gaming Commission has issued a Gaming Activities license to an applicant for a primary management official or key employee position before receiving the NIGC's statement of objections, notice and a hearing shall be provided to the Licensee, as required by Section 28.

Section 27. Denying Gaming Activities Licenses to Certain Gaming Employee Applicants

A. The Tribal Gaming Commission shall not issue a Gaming Activities license to any applicant requesting a Gaming Activities license for any primary management official and key employee position if the Tribal Gaming Commission determines, in applying the standards set forth in Section 24C for making a Gaming Activities license eligibility determinations, that licensing the individual:

1. Poses a threat to the public interest;

2. Poses a threat to the effective regulation of Gaming Activities; or

3. Creates or enhances the dangers of unsuitable, unfair or illegal practices, methods, or activities in the conduct of Gaming Activities.

B. When the Tribal Gaming Commission does not issue a Gaming Activities license to an applicant requesting a Gaming Activities license for any primary management official and key employee position, or revokes a previously issued license after reconsideration, it shall:

1. Notify the NIGC; and

2. Forward copies of its eligibility determination and notice of results of the applicant's background investigation to the NIGC for inclusion in the Indian Gaming Individuals Record System.

Section 28. Suspensions and Revocations of Gaming Activities Licenses Issued to Gaming Employees

A. If the Tribal Gaming Commission issues a Gaming Activities license to an applicant requesting a Gaming Activities license for employment by a Gaming Operation (including primary management officials and key employees), and thereafter the Tribal Gaming Commission receives either (i) reliable information from an objectively reasonably reliable source indicating that the Licensee does not satisfy the eligibility standards adopted in this Tribal Gaming Ordinance, or (ii) notice from the NIGC that the Licensee is not eligible for employment by a Gaming Operation in a primary management official and key employee position, the Tribal Gaming Commission shall do the following:

1. Immediately suspend the Gaming Activities license;

2. Provide the Licensee with written notice of the suspension and proposed revocation; and

3. Provide the Licensee with notice of a time and place for a hearing on the proposed revocation of the Gaming Activities license.

B. Following a revocation hearing, the Tribal Gaming Commission shall decide whether to revoke or reinstate the Gaming Activities license at issue.

C. For action taken in response to a NIGC notice about a Licensee not being eligible for employment by a Gaming Operation in a primary management official and key employee position, the Tribal Gaming Commission shall notify the NIGC of its decision to revoke or reinstate the Gaming Activities license at issue within forty-five (45) days of receiving notification from the NIGC that the Licensee is not eligible for employment by a Gaming Operation in a primary management official and key employee position.

Section 29. Records Retention for Gaming Employees

The Tribal Gaming Commission shall retain the following documentation for any Gaming Employee employed by any Gaming Operation (including primary management officials and key employees), for no less than three (3) years from the date a Licensee's employment with the Gaming Operation terminates: (i) the Licensee's application form for a Gaming Activities license; (ii) the Licensee's investigative reports; and (iii) the Licensee's eligibility determinations.

Section 30. Gaming Resources Supplier Licenses

Each Gaming Resources Supplier must obtain a Gaming Resources Suppliers license from the Tribal Gaming Commission in order to transact business with a Gaming Operation.

Section 31. Submission of a Gaming Resources Supplier License Application

In order to obtain a Gaming Resources Supplier license, the Person must complete a Tribal Gaming Commission approved Gaming Resources Supplier application form and submit to background checks of the Person and its principals. Principals of any Person, for purposes of this Tribal Gaming Ordinance, include the Person's officers, directors, managers, and any owners, partners, and non-institutional stockholders of the Person that either own ten percent (10%) or more of the Person's stock or are the ten (10) largest stockholders, as well as supervisors or employees of the Person who will perform services on-site at any Gaming Space as designated in an agreement with a Gaming Operation, if applicable.

Section 32. Contents of a Gaming Resources Supplier License Application

A. Applications for Gaming Resources Supplier licenses must include the following:

1. Name of business, business address, business telephone number(s), federal tax identification number (or social security number, if a sole proprietorship), main office address (if different from business address), any other name(s) used by the applicant in business, and type of service(s) applicant will provide;

2. Whether the applicant is a partnership, corporation, limited liability company, sole proprietorship, or other entity;

3. If the applicant is a corporation, the state of incorporation, or if the applicant is a limited liability company, the state of organization or formation.

4. Whether the applicant is registered or has qualification to do business in the State of California.

5. Trade name, other names ever used and names of any wholly owned subsidiaries or other businesses owned by the applicant or its principals;

6. General description of the applicant's business and its activities;

7. Whether the applicant will be investing in, or loaning money to, a Gaming Operation, and if so, how much;

8. A description of any existing and previous business relationships with the gaming industry generally, including ownership interests in those businesses;

9. A list of Indian tribes with which the applicant has an existing or previous business relationship, including ownership, financial or management interests in any non-gaming activity;

10. Names, addresses, and telephone numbers of three (3) business references with whom the applicant has regularly done business for the last five (5) years;

11. The name and address of any licensing or regulatory agency with which the applicant has filed an application for a license or permit related to gaming activities, whether or not such license or permit was granted;

12. If the applicant has ever had a license or permit revoked for any reason, the circumstances involved;

13. A list of lawsuits to which the applicant has been a defendant, including the name and address of the court involved, and the date and disposition, if any;

14. Unless the applicant is a publicly traded company, a list of the applicant's funding sources and any liabilities of $50,000 or more;

15. A list of the principals of the applicant, their social security numbers, addresses, telephone numbers, titles and percentage of ownership in the applicant; and

16. Any further information the Tribal Gaming Commission reasonably deems relevant.

B. The following notice shall be placed on the Gaming Resources Supplier application form to be approved by the Tribal Gaming Commission:

Inclusion of false or misleading information in the Gaming Resources Supplier application may be grounds for denial or revocation of any Gaming Resources Supplier license issued to applicant.

C. An applicant for a Gaming Resources Supplier license may submit to the Tribal Gaming Commission a copy of a recent license application to another jurisdiction if it contains substantially the information required to be submitted by the applicant pursuant to Section 32A above. The applicant will be required to submit in writing any changes in the information since the other license application was filed, and

any Section 32A required information requested by the Tribal Gaming Commission not contained in the other application.

Section 33. Background Investigations for Gaming Resources Supplier License Applicants

A. The Tribal Gaming Commission, or its agent, shall employ or engage an investigator to conduct a background investigation of each applicant requesting a Gaming Resources Supplier license. This investigation shall include, at a minimum, the following steps:

1. Verifying the applicant's state of incorporation if the applicant is a corporation, or the state of organization or formation if the applicant is a limited liability company;

2. Verifying the applicant is registered or has qualification to do business in the State of California;

3. Obtaining a business credit report, if available, and conducting a Better Business Bureau check on the applicant;

4. Conducting a check of the applicant's business' credit history;

5. Contacting and interviewing each of the references listed in the applicant's Gaming Resources Supplier license application; and

6. Conducting an investigation of the principals of applicant, including facilitating a criminal history check, obtaining criminal history check results, obtaining a credit report, and interviewing the personal references listed.

B. The Tribal Gaming Commission may employ all reasonable means, including the engagement of outside services and investigators and the holding of hearings, to acquire the information necessary to determine whether or not a license should be issued to a Gaming Resources Supplier license applicant. Applicants shall also agree to release the information necessary in order for the Tribal Gaming Commission to achieve its goals under this Tribal Gaming Ordinance and to furnish such information to the NIGC or such other gaming regulatory agency as may be required by law.

Section 34. Background Investigation Reports and Records Retention for Gaming Resources Supplier License Applicants

A. The investigator shall complete an investigative report covering each of the steps taken in the background investigation of the Gaming Resources Supplier license applicant and its principals and present it to the Tribal Gaming Commission.

B. The Tribal Gaming Commission shall retain the following documentation for any applicant for a Gaming Resources Supplier license for no less than three (3) years

either from the date the applicant submitted a license application if the license is denied or the date the Licensee's business with the Gaming Operation terminates if the license is granted: (i) the applicant/Licensee's application form for a Gaming Resources Supplier license; (ii) the applicant/Licensee's investigative reports; and (iii) the applicant/Licensee's eligibility determinations.

Section 35. Gaming Resources Supplier Licensed by Recognized Gaming Regulatory Authorities

The Tribal Gaming Commission may adopt regulations identifying specific gaming regulatory authorities that it recognizes as having a comparable gaming vendor licensing process as required by this Tribal Gaming Ordinance and may authorize exemptions to the Gaming Resources Supplier licensing process described in Sections 32 through 34 of this Tribal Gaming Ordinance when the applicant has received a license from one of the gaming regulatory authorities within the last two (2) years.

Section 36. Granting Gaming Resources Supplier Licenses

A. The Tribal Gaming Commission is responsible for promptly granting and issuing a Gaming Resources Supplier license to any applicant requesting a Gaming Resource Suppliers license in order to transact business with a Gaming Operation.

B. A Gaming Resources Supplier license may not be granted to an applicant if the Tribal Gaming Commission reasonably determines that the applicant's license application is incomplete or deficient, after giving the applicant reasonable time to cure the deficiencies identified by the Tribal Gaming Commission.

C. Before issuing a Gaming Resources Supplier license to any applicant requesting a Gaming Resources Supplier license in order to transact business with a Gaming Operation, the Tribal Gaming Commission shall review all the information and documents submitted by the applicant to assess whether issuing a Gaming Resource Supplier license to the applicant will undermine public trust that the Gaming Operation is free from criminal and dishonest elements and will be conducted honestly. The Tribal Gaming Commission shall issue the Gaming Resources Supplier license unless the Tribal Gaming Commission reasonably determines that the applicant does not meet all three license eligibility standards criteria described in Section 24C above.

D. A Gaming Resources Supplier license issued under this Tribal Gaming Ordinance shall be reviewed and renewed at least every two (2) years for continuing compliance. In connection with that review, the Tribal Gaming Commission shall require the Licensee to update all information provided in the Licensee's previous application. For the purposes of this section, the review process shall be deemed to constitute an application for license renewal subject to the eligibility standards adopted in this Tribal Gaming Ordinance.

Section 37. Suspensions and Revocations of Gaming Resources Supplier Licenses

A. If the Tribal Gaming Commission issues a Gaming Resources Supplier license to an applicant, and thereafter the Tribal Gaming Commission receives either (i) reliable information from a reliable source, including the NIGC or any other gaming regulatory authorities, indicating that the Licensee does not satisfy the eligibility standards adopted in this Tribal Gaming Ordinance to be granted a Gaming Resources Supplier license, the Tribal Gaming Commission shall do the following:

1. Immediately suspend the Gaming Resources Supplier license;

2. Provide the Licensee with written notice of the suspension and proposed revocation; and

3. Provide the Licensee with notice of a time and place for a hearing on the proposed revocation of the Gaming Resources Supplier license.

D. Following a revocation hearing, the Tribal Gaming Commission shall decide whether to revoke or reinstate the Gaming Resources Supplier license at issue.

Section 38. Financial Source Licenses

A. Each Financial Source shall be licensed by the Tribal Gaming Commission prior to extending financing to a Gaming Operation.

B. The Tribal Gaming Commission shall promulgate such regulations, standards, and guidelines as it deems it appropriate to implement the granting of Financial Source licenses, ensuring that the granting a of license to an applicant will not undermine public trust that the Gaming Operation is free from criminal and dishonest elements and will be conducted honestly; provided Tribal Gaming Commission shall not issue a Financial Source license to any applicant if the Tribal Gaming Commission reasonably determines after review all of the information and documents submitted by the applicant that the applicant does not meet all three license eligibility standards criteria described in Section 24C above.

C. The Tribal Gaming Commission may, at its discretion, exclude from the licensing requirements of this Tribal Gaming Ordinance any Financial Source under the circumstances stated in Section 6.4.5(g) of the Secretarial Procedures.

D. A Financial Source license issued under this Tribal Gaming Ordinance shall be reviewed and renewed at least every two (2) years for continuing compliance. In connection with that review, the Tribal Gaming Commission shall require the Licensee to update all information provided in the Licensee's previous application. For the purposes of this section, the review process shall be deemed to constitute an application for license renewal subject to the eligibility standards adopted in this Tribal Gaming Ordinance.

C. The Tribal Gaming Commission shall retain the following documentation for any applicant for a Financial Source license for no less than three (3) years either from the date the applicant submitted a written request for a Financial Source license or

licensing exemption if the license/exemption is denied or the date the Licensee's business with the Gaming Operation terminates if the license/exemption is granted: (i) the applicant/Licensee's written request for a Financial Source license or licensing exemption ; (ii) the applicant/Licensee's investigative reports, if any; and (iii) the applicant/Licensee's license eligibility determinations or licensing exemptions.

Section 39. Temporary Licenses/Licensing Exemptions

Pending completion of a background investigation of an applicant for either a Gaming Activities license, a Gaming Resources Supplier license, or Financial Source license, a temporary license (or temporary licensing exemption in the case of a Financial Source license applicant) of no more than ninety (90) days duration may be issued by the Tribal Gaming Commission if in its sole discretion it deems it appropriate to do so under the circumstances after conducting an expedited preliminary background investigation of the applicant and making a preliminary determination that, based upon initial information reviewed, the applicant may be eligible for a license or licensing exemption under the eligibility standards adopted in this Tribal Gaming Ordinance. Such temporary licenses or licensing exemptions shall permit the Licensee to be employed by or transact business with a Gaming Operation pursuant to such terms and conditions as may be specified by the Tribal Gaming Commission. Such temporary licenses or licensing exemptions shall expire ninety (90) days from date of issuance, upon issuance of a non-temporary license or licensing exemption to the applicant, or until an earlier specified expiration date, whichever occurs first.

Section 40. Appeals of License Decisions Made by Tribal Gaming Commission

A. All decisions of the Tribal Gaming Commission regarding the issuance or revocation of any licenses to be granted by the Tribal Gaming Commission under this Tribal gaming Ordinance shall be effective when such decision is issued. An applicant or Licensee whose license is denied, revoked or suspended may, within thirty (30) days after the date of receipt of a written decision of the Tribal Gaming Commission, file a petition with the Tribal Gaming Commission requesting a hearing to reconsider the decision, or, in lieu thereof, shall have the right to appeal such decision directly to the Tribal Council in accordance with such rules and regulations as may be promulgated by the Tribal Council for that purpose.

B. Any Tribal Member who is denied a license by the Tribal Gaming Commission may, within sixty (60) days of written notice of such denial, appeal the denial to the Tribal Gaming Commission, which shall have the power to reverse its prior decision and order that a license be issued. The Tribal Member shall have the right to appeal any decision affirming denial by the Tribal Gaming Commission to the Tribal Council within thirty (30) days after the date of receipt of the decision.

C. If the Tribal Gaming Commission or Tribal Council reverses a prior license decision and issues or reinstates a license to an applicant or Licensee, such license shall not be issued or reinstated for more than one (1) year, shall be subject to the renewal procedures set forth herein, and such reversal order and issuance/reinstatement of a license shall only be valid if to do so would not violate this Tribal Gaming

Ordinance, IGRA, NIGC regulations, the Secretarial Procedures or of any applicable law. The Tribal Council may, by resolution, delegate its duties described in this Section 40 to a Tribal Court established or designated by the Tribal Council.

Section 41. Compliance with Federal Law

The Tribal Gaming Commission and each Gaming Operation shall comply with all applicable federal laws, including the Bank Secrecy Act, 31 U.S.C. § 5311 *et seq.*

Section 42. No Interest in Management Contracts by Tribal Officials

No elected or appointed official of the Tribe, including the Tribal Gaming Commission or any other committee or agency of the Tribe, shall have a financial interest in or management responsibility for, any management agreement entered into pursuant to IGRA with respect to any Gaming Operation, nor shall such elected or appointed official serve on the board of directors or hold (directly or indirectly) ten percent (10%) or more of the issued and outstanding stock of any corporation, or ten percent (10%) or more of the beneficial interest in any partnership, trust, or other entity, in any such corporation, partnership, trust or other entity, having a financial interest in or management responsibility for such management agreement.

Section 43. Tribal Gaming Enterprise

Nothing in this Tribal Gaming Ordinance shall prevent the Tribe from conducting a Gaming Operation as a d/b/a of the Tribe with its own federal tax identification number, or the Tribal Council delegating the authority to conduct a Gaming Operation to one or more tribal enterprises or corporations, so long as each Gaming Operation meets all criteria and requirements established under this Tribal Gaming Ordinance.

Section 44. Severability of Provisions

If any provision or application of this Tribal Gaming Ordinance is determined by a proper authority upon review in accordance with IGRA to be invalid under the circumstances, such determination shall not be held to render such provision or application inapplicable to other Persons or circumstances, nor shall such determination render invalid any other provision of this Tribal Gaming Ordinance.

Section 45. Duty to Report Theft

Whenever the Tribal Gaming Commission knows or has reason to know, based upon reasonably reliable information, that a theft or embezzlement ("theft") of any Gaming Operation funds has occurred, the Tribal Gaming Commission shall immediately notify the Tribal Council and the general manager/executive officer of the Gaming Operation, or, in the event that the suspect is the general manager/executive officer of the Gaming Operation, then only the Tribal Council, that such theft has been committed and shall immediately report the theft and file a complaint with the appropriate law enforcement agency (i.e. Federal Bureau of Investigation or the Tuolumne County Sheriff's Department).

Section 46. Amendments

All provisions of this Tribal Gaming Ordinance are subject to revision, repeal, or amendment by the Tribal Council at any time, subject to applicable requirements of IGRA. Regulations promulgated by the Tribal Gaming Commission under this Tribal Gaming Ordinance are subject to revision, repeal, or amendment by the Tribal Gaming Commission at any time, subject to applicable requirements of this Tribal Gaming Ordinance, the Secretarial Procedures, and IGRA.

Section 47. Repeal

This Tribal Gaming Ordinance replaces and supersedes all prior gaming ordinances enacted by the Tribal Council, including Ordinance 99-07-21-01 (as amended), which are hereby repealed in their entirety.

Section 4. Effective Date

This Tribal Gaming Ordinance shall take effect immediately upon its approval by the NIGC Chairman in accordance with the Indian Gaming Regulatory Act.

CERTIFICATION

The foregoing Tribal Gaming Ordinance was duly adopted and enacted at a meeting of the Tribal Council of the Chicken Ranch Rancheria of Me-Wuk Indians of California held on the 15th day of July 2026, with a quorum present, by the following vote:

AYES: 5
NOES: 0
ABSTAIN: 0
ABSENT: 0

Joseph Mathiesen-Powell, Chairman of the Tribal Council

ATTESTED:

Melissa Powell, Secretary of the Tribal Council