



# Miami Tribe of Oklahoma

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**National Indian Gaming Commission  
Tribal Consultation  
Milwaukee, WI  
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**Comment by Thomas E. Gamble, Chief, Miami Tribe of Oklahoma**

Good morning Commissioner Stevens, Commissioners, and staff. Thank you again for the opportunity to comment this morning concerning the NIGC consultation topics. My name is Tom Gamble and I serve as Chief of the Miami Tribe of Oklahoma. My comments are respectfully submitted today on behalf of the Business Committee and our 4,000 tribal members, and shall be read into the record, in my absence, by Robin Lash, our Attorney and Gaming Commissioner.

Though this consultation today involves a myriad of topics, my comments today will concern primarily Class II Minimum Internal Control Standards. As I expressed last week during the Mystic Lake Consultation, the Class II regulation topics are very important to the Miami Tribe. Though the Miami Tribe was the third tribe in Oklahoma to compact with the State in 2005, we choose to operate only Class II gaming in our casino.

Class II gaming has made a huge difference for the Tribe since we started gaming in the mid-1990's. As a result of Class II revenues, the Tribe has experienced impressive growth in our tribal infrastructure, businesses, and essential governmental services. In addition to offering Class II gaming, in 1999 the Tribe made a unique decision to enter into Class II gaming as a business as well. The Tribe created the Miami Business Development Authority, a subordinate governmental entity, and purchased WorldLink Gaming Corporation, also known as Rocket Gaming Systems. Over the past 12 years, our business relationship with Rocket Gaming Systems has flourished and Rocket continues to grow with cutting edge, state-of-the-art Class II gaming systems.

As a tribe with a Class II casino, and as a manufacturer of Class II gaming systems, we feel it is very important for the Tribe to comment today concerning the MICS regulations topic. As I stated last week, the Tribe and our Miami Business Development Authority have been very involved with the Tribal Gaming Working Group meetings which have taken place since last

November. This Tribal Gaming Working Group has completed an in-depth review of Parts 543 and 547, and the proposed revised regulations submitted to you by the group on May 15<sup>th</sup>, are well-organized, concise regulations that more clearly establish the minimum requirements for Class II internal controls and technical standards.

I understand from last week's consultation that there was some concern because the proposed 543 document looks so different. As explanation, in the proposed revised document, the TGWG reorganized 543, added more definitions, and created new subparts for clearer regulation. For instance, in the current regulations the subpart Bingo contains all kinds of topics, some better suited as separate subparts. For example, accounting language was taken out of Bingo and included with audit to create a new subpart for MICS Audit and Accounting. Promotions was taken out of Bingo and made into its own subpart. In the current MICS, repetitive regulations for surveillance are contained in three separate, tier-related subparts. In the proposed document, Surveillance is one subpart which includes the tier related requirements.

The proposed 543 document is smaller in size than the current 543 which contains huge sections of procedure-related language instead of just required standards, or regulations. The Tribal Gaming Working Group removed all the procedure-related language leaving only the regulation itself. This allows for the tribes - as the primary regulators of Class II gaming - to implement procedures to comply with the regulations. The TGWG are preparing guidance documents and checklists to correspond with each subpart of 543 to assist tribes in drafting and implementing procedures to comply.

As a tribal leader it is my job to ensure that the integrity of our tribal gaming is protected and that revenues stemming from tribal gaming are secure. This is accomplished with clear, concise regulations. I am confident that adoption of the proposed regulations will allow for lawful, well-regulated Class II gaming that will serve the interests of the tribes - as primary regulators of Class II gaming - as well as the NIGC, in its oversight role.

I would like to express to your Commission the sincere gratitude of the Miami Tribe for allowing the tribes to submit proposed regulations we feel are more clearly written to allow for better regulation of our facilities. With your Commission, I know that IGRA's vision for a close, cooperative relationship between the NIGC and the tribes, is possible. I look forward to a continued positive working relationship for the benefit of the tribes and Indian gaming.

Respectfully,

A handwritten signature in black ink, appearing to read 'Thomas E. Gamble', written in a cursive style.

Thomas E. Gamble, Chief  
Miami Tribe of Oklahoma