



October 27, 2014

By U.S. Mail and Facsimile

President Terri Parton
Wichita and Affiliated Tribes
P.O. Box 729
Anadarko, OK 73005

Re: Amended Tribal Gaming Ordinance

Dear President Parton:

This letter responds to a request from the Wichita and Affiliated Tribes ("Tribe") for approval by the National Indian Gaming Commission ("NIGC") of revisions to the Tribe's Gaming Ordinance ("Ordinance"). The NIGC received the request on August 19, 2014, along with Resolution WT-14-184, which was adopted by the Executive Committee of the Tribal Council and authorized revisions to the Tribe's existing Ordinance. The existing Ordinance had previously been approved by the NIGC on August 21, 2002.

We appreciate that the Tribe brought these revisions to our attention. The Tribe's amended Ordinance is approved, as it is consistent with the requirements of the Indian Gaming Regulatory Act and the NIGC's regulations. If you have any questions or require assistance, please contact Katherine Zebell, Staff Attorney, at (202) 632-7003.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jonodev O. Chaudhuri".

Jonodev O. Chaudhuri
Chairman (Acting)

WICHITA AND AFFILIATED TRIBES

GAMING ORDINANCE

Section 1. Purpose

The Executive Committee of the Wichita and Affiliated Tribes (hereinafter "Tribe"), empowered by Article V of the Wichita Governing Resolution to enact ordinances, hereby enacts this Ordinance in order to govern and set the terms for Class II and Class III gaming operations on "Indian lands," as defined in the Indian Gaming Regulatory Act ("IGRA"), 25 U.S.C. §§ 2701, *et. seq.*

Section 2. Gaming Authorized

- A. Class II gaming as defined in the IGRA, 25 U.S.C. § 2703(7)(A), by the regulations promulgated by the National Indian Gaming Commission ("NIGC") at 25 C.F.R. § 502.3 (as published in the Federal Register at 57 FR 12382-12393, April 9, 1992), and by federal jurisprudence interpreting the IGRA and/or NIGC regulations is hereby authorized.
- B. Class III gaming as defined in the IGRA and by the regulations promulgated by the NIGC at 25 C.F.R. § 502.4 is hereby authorized. Any Class III gaming shall be conducted in accordance with a compact or Secretarial procedures approved by the Secretary of the Interior.

Section 3. Ownership of Gaming

The Tribe shall have the sole proprietary interest in and responsibility for the conduct of any gaming operation authorized by this Ordinance.

Section 4. Use of Gaming Revenue

- A. Net revenues from Class II and Class III gaming shall be used only for the following purposes:
 - 1. to fund tribal government operations and programs;
 - 2. to provide for the general welfare of the Tribe and its members;
 - 3. to promote tribal economic development;
 - 4. to donate to charitable organizations; or
 - 5. to help fund operations of local government agencies.

- B. If the Tribe elects to make per capita payments to tribal members, it shall authorize such payments only in accordance with a plan submitted to and approved by the Secretary of the Interior under 25 U.S.C. § 2710(b)(3).

Section 5. Tribal Gaming Commission

- A. The Tribe hereby establishes a four member Tribal Gaming Commission whose duty it is to regulate tribal gaming operations and conduct oversight of all tribal gaming activities to ensure compliance with federal, tribal, and, if applicable, state laws and regulations. The Tribal Gaming Commission functions as a regulatory agency for the Tribe and does not serve in a managerial capacity to the tribally licensed gaming operations. As an agency of the Tribe, the Tribal Gaming Commission has the full protection of the Tribe's sovereign immunity in carrying out its lawful duties.
- B. Positions on the Tribal Gaming Commission shall be filled by appointment by the Tribal President with approval of the Tribal Executive Committee. The Tribal Executive Committee will designate a Chairman of the Tribal Gaming Commission from the four appointed Commissioners at the time of initial appointment of the Tribal Gaming Commission. The Chairman of the Tribal Gaming Commission will chair all Commission hearings, supervise Commissioners, Commission staff, and only vote in the case of a tie during Commission proceedings. Compensation, composition and terms of the members of the Tribal Gaming Commission shall be determined by the Tribal Executive Committee. Three Commissioners will constitute a quorum for all official business of the Tribal Gaming Commission including meetings, rule-making, and hearings.
- C. Members of the Tribal Gaming Commission shall satisfy the eligibility standards set forth in Section 8, Licenses for Gaming Employees, Key Employees and Primary Management Officials, for key employees and primary management officials, which shall include a satisfactory background investigation performed under the direction of the Tribal Executive Committee.
- D. The Tribal Gaming Commission shall be and act independently and autonomously from the Tribal Executive Committee in matters within its purview. Tribal Gaming Commission staff shall be hired through a tribal personnel process with such other conditions as the Commission may adopt, provided that the Tribe's laws governing tribal member and Indian preference shall at all times be applicable. Tribal Gaming Commission staff shall satisfy the eligibility standards set forth in Section 8, Licenses for Gaming Employees, Key Employees and Primary Management Officials, for key employees and primary management officials.
- E. The Tribal Gaming Commission shall serve as the licensing authority for individuals employed in the gaming operation and will administer an effective program for background investigations as part of the licensing process. In order

to carry out its duties, the Tribal Gaming Commission shall have unrestricted access to all areas of the gaming operation and to all records; however, the Tribal Gaming Commission shall not have access to employee medical or treatment records unless such access, within the reasonable discretion of the Tribal Gaming Commission, is necessary for the proper regulation of the tribal gaming operation. Duties of the Tribal Gaming Commission shall include, but not be limited to:

1. Conducting or causing background investigations to be performed on primary management officials, key employees, gaming employees and non-gaming employees;
2. Reporting results of background investigations to the NIGC, as applicable;
3. Obtaining and processing fingerprints, or designating a law enforcement agency to obtain and process fingerprints;
4. Making license eligibility determinations;
5. Issuing gaming licenses to management officials and employees of the gaming operation, consistent with eligibility determinations;
6. Taking enforcement actions, including suspension or revocation of an individual gaming license, when appropriate;
7. Holding hearings on employee complaints, disputes and licensing matters, in compliance with procedures established in this Ordinance and other tribal gaming regulations;
8. Issuing procedures and regulations for compliance with the NIGC's Minimum Internal Control Standards and monitoring such compliance; and
9. Such other duties as necessary for the proper regulation of the tribal gaming operation. The authority of the Tribal Gaming Commission shall not be construed as divesting authority of the Tribal Executive Committee, should there be a conflict.

F. The following persons shall not be eligible to serve on the Tribal Gaming Commission:

1. Tribal Executive Committee members, while serving as such;
2. Employees of the gaming operation, while serving as such;
3. Gaming contractors; or
4. Persons convicted of a felony, embezzlement, fraud, or other money-related or honesty-related crime.

- G. Tribal Executive Committee members, Tribal Gaming Commissioners, Commission staff, all gaming licensed staff, key employees, and primary management officials are prohibited from gaming in the tribally licensed gaming facilities whether on duty or off duty during the term of their employment or their position.
- H. Members of the Tribal Gaming Commission are subject to removal by the Tribal Executive Committee after a duly noticed hearing resulting from an appropriately filed charge of any of the following: neglect of duty, misconduct, malfeasance, or other acts or circumstances that would render a Gaming Commissioner unqualified or unsuitable based on the standards provided in this Ordinance. If any of the enumerated charges are substantiated during the hearing before the Tribal Executive Committee, the Gaming Commissioner will be immediately removed. A position on the Tribal Gaming Commission that becomes vacant as the result of removal hereunder shall be filled within ten (10) working days of said removal in accordance with Section 5 (B) of this Ordinance.

Section 6. Audit

- A. The Tribe shall cause to be conducted annually an outside independent audit of gaming operations and shall submit the resulting audit reports to the NIGC. The Tribe shall cause any additional audits required from time to time by applicable law to be conducted in conformance therewith. Auditor selection and engagement shall be by the Tribal Executive Committee which may, in its sole discretion, delegate all or a portion of selection and engagement to the Tribal Gaming Commission through resolution. The Tribe's fiscal year shall be October 1st through September 30th (or as otherwise established by the Tribe).
- B. All gaming related contracts that result in the purchase of supplies, services, or concessions in excess of \$25,000.00 annually, except contracts for professional legal and accounting services, shall be specifically included within the scope of the audit that is described in Subsection A above.

Section 7. Protection of the Environment and Public Health and Safety

Gaming facilities shall be constructed, maintained and operated in a manner that adequately protects the environment and the public health and safety. Gaming facilities shall conform to applicable Tribal and federal environmental and public health and safety standards.

Section 8. Licenses for Gaming Employees, Key Employees and Primary Management Officials

The Tribe shall ensure that the policies and procedures set out in this Section are implemented with respect to gaming employees, key employees, and primary management officials employed at any gaming enterprise operated on Indians lands:

- A. Definitions

For the purposes of this Section, the following definitions apply:

1. "Key employee" means

- (a) A person who performs one or more of the following functions:
 - (1) Bingo caller;
 - (2) Counting room supervisor;
 - (3) Chief of security;
 - (4) Custodian of gaming supplies or cash;
 - (5) Floor manager;
 - (6) Pit boss;
 - (7) Dealer;
 - (8) Croupier;
 - (9) Approver of credit; or
 - (10) Custodian of gambling devices including persons with access to cash and accounting records within such devices.
- (b) If not otherwise included, any other person whose total cash compensation is in excess of \$50,000 per year; or
- (c) If not otherwise included, the four most highly compensated persons in the gaming operation.

2. "Primary management official" means

- (a) The person(s) having management responsibility for a management contract;
- (b) Any person who has authority;
 - (1) To hire and fire employees; or
 - (2) To set up working policy for the gaming operation; or
- (c) The chief financial officer or other person who has financial management responsibility.

3. "Gaming employee" means

- (a) Any person included in the definition of key employee or primary management official; or
- (b) Any person;
 - (1) Who operates, supervises, maintains, repairs, accounts for or is involved in any gaming activities;

- (2) Whose duties require unescorted access to restricted gaming areas of the gaming facility; or
- (3) Who has supervisory authority over the foregoing persons.

B. Application Forms for All Gaming Employees

1. The following notice shall be placed on the application form for a gaming employee, a key employee or a primary management official before that form 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 (NIGC) 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 the Tribe being unable to hire you in 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. "

2. The following notice shall be placed on the application form for a gaming employee, a key employee or a primary official before that form 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.)"

C. Background Investigations for All Gaming Employees

The Tribal Gaming Commission shall conduct background investigations and eligibility determinations for primary management officials and key employees, as well as all gaming employees.

1. The Tribal Gaming Commission shall request from each primary management official, from each key employee, and from each applicant to a gaming position in a tribally licensed gaming operation all of the following information:
 - a. Full name, other names used (oral or written), social security number(s), birth date, place of birth, citizenship, gender, all languages (spoken or written);
 - b. Currently and for the previous 10 years: business and employment positions held, ownership interests in those businesses, business and residence addresses, and driver license numbers;
 - c. The names and current addresses of at least five personal references, including one personal reference who was acquainted with the applicant during each period of residence listed under paragraph (1)(b) of this Section;
 - d. Current business and residence telephone numbers;
 - e. A description of any existing and previous business relationships with Indian tribes, including ownership interests in those businesses;
 - f. A description of any existing and previous business relationships with the gaming industry generally, including ownership interests in those businesses;
 - g. The name and address of any licensing or regulatory agency with which the person has filed an application for a license or permit related to gaming, whether or not such license or permit was granted;
 - h. 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 and disposition, if any;
 - i. 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 and disposition, if any;
 - j. 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 (1) (h) or (1) (i) of this Section, the criminal charge, the name and address of the court involved, and the date and disposition, if any;

- k. The name and address of any licensing or regulatory agency with which the person has filed an application for an occupational license or permit, whether or not such license or permit was granted;
- l. A current photograph;
- m. Any other information the Tribal Gaming Commission deems relevant; and
- n. Fingerprints consistent with procedures adopted by the Tribe according to 25 C.F.R. § 522.2(h).

- 2. The Tribal Gaming Commission shall conduct an investigation sufficient to make a determination under Subsection D below. This shall include verification of information submitted by the applicant. The Tribe shall document all potential problem areas noted and any disqualifying information. In conducting a background investigation, the Tribe or its agent shall promise to keep confidential the identity of each person interviewed in the course of the investigation.
- 3. The Tribal Gaming Commission shall take fingerprints of each primary management official, and each key employee, and each applicant to a gaming position in a tribally licensed gaming operation. Fingerprints shall be obtained by the Tribal Gaming Commission for primary management officials and key employees and will then be forwarded to the NIGC for processing through the Federal Bureau of Investigation and the National Crime Information Center to determine the applicant's criminal history, if any.
- 4. When a gaming operation employs a primary management official or a key employee, a complete application file containing the information listed in Subsection C(1)(a) through (n) of this Section shall be maintained by the Tribal Gaming Commission.

D. Eligibility Determination

The Tribal Gaming Commission shall review a person's prior activities, criminal record, if any, and reputation, habits and associations to make a finding concerning the eligibility of a gaming employee, a key employee or primary management official for the granting of a gaming license. If the Tribal Gaming Commission, in applying the standards adopted in this Ordinance, determines that licensing of the person poses a threat to the public interest or to the effective regulation of gaming, or creates or enhances dangers of unsuitable, unfair, or

illegal practices, methods, and activities in the conduct of gaming, the Tribal Gaming Commission shall not license that person in a gaming employee, key employee or primary management official position.

E. Procedures for Submitting Reports for Key Employees and Primary Management Officials to the NIGC

Before issuing a license to a primary management official or key employee, the Tribal Gaming Commission shall submit the notice of results of an applicant's background investigation for key employees and primary management officials, referred to in Subsection F of this Section, to the NIGC within sixty (60) days after an applicant begins work. No key employee or primary management official shall be employed for longer than ninety (90) days without a license.

F. Reports to the NIGC

1. The Tribal Gaming Commission shall create and maintain an investigative report for each background investigation of a primary management official or key employee. An investigative report shall include all of the following:
 - a. Steps taken in conducting a background investigation;
 - b. Results obtained;
 - c. Conclusions reached; and
 - d. The basis for those conclusions.
2. Before issuing a license to a primary management official or key employee, the Tribal Gaming Commission shall submit a notice of results of an applicant's background investigation to the NIGC within the time period required in Subsection E of this Section. The notice of results shall include all of the following:
 - a. The applicant's name, date of birth and social security number;
 - b. The date on which the applicant began or will begin work as a primary management official or key employee;
 - c. A summary of the information presented in the investigative report, which shall include all of the following:
 - (1) Licenses that have previously been denied;
 - (2) Gaming licenses that have been revoked, even if subsequently reinstated;

- (3) Every known criminal charge brought against the applicant within the last ten (10) years of the date of the application; and
 - (4) Every felony of which the applicant has been convicted or any ongoing prosecution; and
 - d. A copy of the eligibility determination made under Subsection D of this Section.
3. If a license is not issued to a primary management official or key employee applicant, the Tribal Gaming Commission:
 - a. Shall notify the NIGC; and
 - b. Shall forward copies of its eligibility determination and notice of results to the NIGC for inclusion in the Indian Gaming Individuals Records System.
4. With respect to key employees and primary management officials, the Tribal Gaming Commission shall retain applications for licensing, investigative reports and eligibility determinations for inspection by the Chairman of the NIGC or his or her designee for no less than three (3) years from the date of termination of employment.

G. Granting an Employee Gaming License

1. The Tribal Gaming Commission may issue a license to a primary management official or key employee after submitting a notice of results of the applicant's background investigation to the NIGC. The Tribal Gaming Commission shall notify the NIGC of the issuance of a license to a primary management official or key employee within thirty (30) days of issuance.
2. The Tribal Gaming Commission shall reconsider a license application for a primary management official or key employee if it receives a statement of itemized objections to issuing such 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. The Tribal Gaming Commission shall take the NIGC's objections into account when reconsidering a license application. The Tribal Gaming Commission shall make the final decision whether to issue a license to such applicant.
3. If the Tribal Gaming Commission has issued a license to a primary management official or key employee before receiving the NIGC's statement of objections, notice and a hearing shall be provided to the licensee.

H. Temporary Hire

1. Applicants to key employee or primary management official positions may be temporarily hired following the eligibility determination of the Tribal Gaming Commission set forth in Subsection D of this Section. These types of employees will not be considered regular benefited employees of the tribal gaming operation until the Tribal Gaming Commission issues an employment gaming license following the required process provided in this Section. If the employee license is denied by the Tribal Gaming Commission, the temporarily hired key employee or primary management official will be immediately terminated upon notice of the denial.
2. Other tribal gaming employees may be temporarily hired until the eligibility determination of the Tribal Gaming Commission results in either the issuance of an employee gaming license or the denial of the employee license upon which the temporarily hired employee will be immediately terminated upon notice of the denial.

I. License Suspension

1. If, after the issuance of a license to a primary management official or key employee, the Tribal Gaming Commission receives from the NIGC reliable information indicating that a key employee or a primary management official is not eligible for employment under Subsection D of this Section, the Tribal Gaming Commission shall immediately suspend such license and shall notify in writing the licensee of the suspension and the proposed revocation.
2. The Tribal Gaming Commission shall notify the licensee of a time and a place for a hearing on the proposed revocation of a license.
3. The right to a revocation hearing vests only when a license is granted under this Ordinance, as approved by the NIGC Chair.
4. After a revocation hearing, the Tribal Gaming Commission shall decide to revoke or to reinstate a gaming license. The Tribal Gaming Commission shall notify the NIGC of its decision to revoke or reinstate a license within forty-five (45) days of receiving notification from the NIGC that a primary management official or key employee is not eligible for employment.

Section 9. Non-Gaming Employees

- A. For purposes of this Section, "non-gaming employee" means any employee employed at a gaming operation that is not included within the definition of primary management official, key employee or gaming employee. Non-gaming employees shall include, but not be limited to, persons engaged solely in food and

beverage, hotel, janitorial or other non-gaming areas connected to or ancillary to a gaming operation.

- B. A license shall not be required for non-gaming employees. However, all non-gaming employees shall be required to obtain a non-gaming employee work permit from the Tribal Gaming Commission prior to employment. Non-gaming employee work permits shall be subject to denial, revocation, condition or renewal by the Tribal Gaming Commission.
- C. The Tribal Gaming Commission may promulgate regulations for non-gaming employee work permits as deemed necessary by the Tribal Gaming Commission, subject to the requirements of this Ordinance.
- D. Prior to employment, all non-gaming employees shall be required to complete a non-gaming employee work permit application, undergo a background investigation and sign all consent and other forms required by the Tribal Gaming Commission. The Tribal Gaming Commission shall request from each non-gaming employee applicant, the following information:
 - 1. Full name, social security number, birth date, place of birth, citizenship, gender and current residence and business addresses and telephone numbers;
 - 2. Current and for the previous five (5) years, all employment and business positions held;
 - 3. Current and valid driver's license or other government issued photo identification card;
 - 4. The applicant's written release of all claims arising out of the processing and investigation of the application; and
 - 5. Any other information the Tribal Gaming Commission deems relevant.
- E. The Tribal Gaming Commission shall review a non-gaming employee's application and background investigation results to make a finding concerning the eligibility of a non-gaming employee for employment in a gaming operation. The Tribal Gaming Commission shall approve a non-gaming employee work permit unless, based on its review of the application and background investigation results, the Tribal Gaming Commission determines that a non-gaming employee applicant would pose a danger to the safety or integrity of the gaming operation or the safety of the public, in which case, the Tribal Gaming Commission shall deny a non-gaming work permit application.
- F. The Tribal Gaming Commission may grant, deny, revoke or condition a non-gaming employee work permit in accordance with the standards in this Section 9 or any regulations promulgated by the Tribal Gaming Commission.

Section 10. License Locations

The Tribal Gaming Commission shall issue a separate license to each place, facility, or location on Indian lands where Class II and/or Class III gaming is conducted under this Ordinance.

Section 11. Dispute Resolution

A. Hearing Procedures

For all hearings provided under this Ordinance, the following procedures will apply:

1. Written notice of a scheduled hearing will be given to affected parties at least five (5) working days prior to the hearing.
2. Parties will be required to be present in person at all scheduled hearings and may petition the Tribal Gaming Commission for a continuance not to exceed five (5) working days of the originally scheduled hearing. The Tribal Gaming Commission may grant the continuance based upon a reasonable justification for such continuance. Parties not present at a scheduled hearing will be bound by any Tribal Gaming Commission decision resulting from the hearing.
3. Parties may present evidence on their own behalf including affidavits, voice recordings and any other relevant documentation. Parties may have legal representation during Tribal Gaming Commission hearings.
4. The Tribal Gaming Commission will make its determination based upon a preponderance of the evidence presented during the hearing.
5. Three Tribal Gaming Commission members will constitute a quorum for Tribal Gaming Commission hearings.
6. The Tribal Gaming Commission will base its decision on an affirmative majority vote of its members with the Tribal Gaming Commission Chairman voting only in the case of a tie.
7. The written determination of the Tribal Gaming Commission will be delivered to affected parties within five (5) working days of the hearing.
8. An appeal will be available from any determination of the Tribal Gaming Commission to the Court of Indian Offenses for the Wichita and Affiliated Tribes (until such time as the Tribe assumes such responsibilities from the BIA through establishment of a Tribal Court). The Court may either affirm or reverse a ruling of the Tribal Gaming Commission and will not grant any monetary or equitable relief.

B. Patron Disputes

Disputes between the gaming public and the tribally licensed gaming facilities will initially be addressed by the gaming manager or relevant department head on duty, and if not satisfactorily addressed further recourse will be available to the General Manager of the enterprise. If the decision of the General Manager does not resolve the dispute, then the dispute may be reviewed by the Tribal Executive Committee, which would render a final decision with respect to the matter.

Section 12. Minimum Internal Control Standards

The Tribe shall adopt and implement Minimum Internal Control Standards for the operation of its gaming operation that are no less stringent than those applicable to it pursuant to federal law and where otherwise expressly agreed upon through a valid gaming compact or Secretarial procedures..

Section 13. Vendor Licensing

A non-management gaming contractor license may be issued by the Tribal Gaming Commission to any person, organization, or entity for a license to sell, lease, market or otherwise distribute gambling devices, equipment, games, implements, services (other than professional legal or accounting), products or supplies to the Tribe's gaming operations.

Section 14. Complimentary Items

Complimentary items are defined according to 25 C.F.R. § 542.17 as any cash or non-cash gifts. For all such items in the amount of fifty dollars (\$50.00) or more, the Tribal Gaming Commission shall require a weekly report from authorized gaming employees as to the recipient of the item, the date received, the actual cash value of the item, the type of complimentary item or service (i.e., beverage, food, etc.) and the name of the authorized employee approving the item.

- A. Except as otherwise provided in Subsection B of this Section, no Tribal Gaming Commissioner, Commission staff member, key employee, primary management official, Tribal Executive Committee member, or any person directly related to such persons shall be authorized to receive complimentary items.
- B. The Tribal Executive Committee members are each authorized to receive, at no cost, two (2) tickets or admissions to entertainment events held at a gaming operation for the purpose of observance of such events.
- C. Complimentary items shall be included in the annual budget for the gaming operation, with maximum limits specified and shall be subject to approval by the Tribal Executive Committee.

Section 15. Agent for Service of Process

The Tribe hereby designates the Tribal President as agent for service of process, who may be contacted at:

Tribal President
Wichita & Affiliated Tribes
P.O. Box 729
Anadarko, OK 73005

Section 16. Repeal

To the extent that they are inconsistent with this Ordinance, all prior gaming ordinances are hereby repealed and replaced with the foregoing Ordinance.

Wichita and Affiliated Tribes

Terri Parton
President

Jesse E. Jones
Vice President

Myles Stephenson Jr.
Secretary

S. Robert White Jr.
Treasurer



Shirley Davilla
Committee Member

Karen Thompson
Committee Member

Gladys Walker
Committee Member

Tribal Administration
P.O. Box 729 · Anadarko, OK 73005
Telephone (405) 247.2425 Fax (405) 247.2430
www.wichitatribe.com

WT-14-184

RESOLUTION

Adopting and Authorizing the ReSubmission of the Revisions for the Wichita and Affiliated Tribes Gaming Ordinance

WHEREAS, the Wichita and Affiliated Tribes (Wichita, Keechi, Waco, and Tawakoni) (the "Tribe") possess substantial inherent sovereign powers and has exercised those powers since time immemorial; and

WHEREAS, the Tribe has a duly established Tribal Government recognized by the Secretary of the Interior; and

WHEREAS, Article V of the Wichita Governing Resolution authorizes and empowers the Executive Committee of the Wichita and Affiliated Tribes to act in all matters of business on behalf of the Tribe; and

WHEREAS, the Wichita and Affiliated Tribes adopted the "Wichita and Affiliated Tribes Gaming Ordinance" on April 22, 2002 and received a letter of approval from the National Indian Gaming Commission dated August 21, 2002; and

WHEREAS, the Executive Committee desired to update and make revisions to the ordinance which were previously approved by the Wichita Executive Committee on June 17, 2014 by Resolution WT-14-116, and

WHEREAS, the revisions were submitted to NIGC for approval and returned with recommendations from NIGC, and

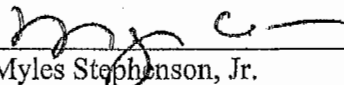
WHEREAS, the Tribe has incorporated many of the revisions and desires to resubmit the revisions to NIGC for approval.

NOW THEREFORE BE IT RESOLVED that the Executive Committee of the Wichita and Affiliated Tribes hereby adopts and authorizes the resubmission of the Wichita and Affiliated Tribes Gaming Ordinance to NIGC with revisions.

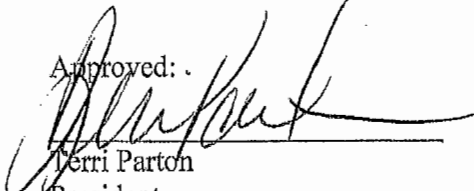
CERTIFICATION

The foregoing resolution was adopted by the Executive Committee of the Wichita and Affiliated Tribes of Oklahoma on August 12, 2014, in Anadarko, Oklahoma, by a vote of 5 for, 0 against and 1 abstentions, a quorum being present.

Attest:



Myles Stephenson, Jr.
Secretary

Approved: .


Terri Parton
President