



Participant Workbook
Sacramento Regional Training Course
Track 2

Dear Training Course Participant,

Over twenty five years ago Congress adopted the Indian Gaming Regulatory Act (IGRA) to provide statutory support for gaming by Indian tribes. The National Indian Gaming Commission (NIGC) was created by IGRA to partner with tribal regulators to regulate gaming activities conducted by sovereign Indian tribes on Indian lands. The mission of the NIGC is to fully realize IGRA's goals of: (1) promoting tribal economic development, self-sufficiency and strong tribal governments; (2) maintaining the integrity of the Indian gaming industry; and (3) ensuring that tribes are the primary beneficiaries of their gaming activities.

One of the primary ways the NIGC does this is by providing training and technical assistance to Indian tribes and their gaming regulators.

A properly trained and informed workforce is the most successful key to regulation and the assurance of compliance. Focused, targeted and responsive training and technical assistance programs provide a foundation that maintains the integrity and success of Indian gaming.

Through dedication and hard work, Indian gaming has experienced notable and successful growth thanks to the partnership of dedicated employee's, regulators and tribal governments and the NIGC. Our continued success depends on grabbing the growing momentum and *"Work Together for Success"*, now and into the coming future.

With this backdrop in mind, we encourage you to take advantage of the NIGC training opportunities highlighted by this course. The Commission recognizes your work is essential to the success of Indian gaming and encourages you to use the tools you will receive and knowledge you will gain from this course to further regulatory excellence in Indian gaming.



Jonodev Osceola Chaudhuri
NIGC Chairman



Kathryn Isom-Clause
Associate Commissioner



E. Sequoyah Simermeyer
Associate Commissioner

Course Rationale

The National Indian Gaming Commission (NIGC) Regional Training Course is designed to provide a common foundation of knowledge and skills to prepare Tribes to work together to effectively understand and meet requirements to ensure compliance and provide a successful basis for economic development.

NIGC Training is built around adult learning principles, with knowledge delivery for understanding and everywhere possible, application level exercises, workshops and opportunities to collaborate in or for each attendee to have an opportunity to achieve understanding, doing and getting feedback on results – and doing again! Working together and using the skills and knowledge applicable to improve processes as soon as they return to work.

The 6 key benefits to the NIGC Training Model:

1. Provides real focus on issues and concerns important to attendees for meeting compliance.
2. Builds a sense of shared experience and language around the tools and methodologies.
3. Develops an understanding of the trends and concerns impacting Tribes and Indian Country in gaming.
4. Provides a safe environment for query, experimentation and failure.
5. Encourages application and testing in a true problem solving focus.
6. Provides a venue to develop relationships that improve communication, commitment and productivity.

Course Description

The Regional Training Course is designed around information and knowledge sharing dealing with current and ongoing issues and concerns in Indian Gaming, critical learning areas for compliance, and new and trending changes in regulation. Infused with real time information, current opportunities and ground breaking tools, the course provides all attendees flexible and relevant learning options. The course is designed for novice and veteran staff. The course will offer instruction in the following content areas:

Sacramento Region Guidance on the Issues

The course is a panel discussion of the issues within the region. Participants will gain an understanding and discuss solutions surrounding issues they face in their region. It will highlight regional performance with comparative statistics to better gain an understanding of trends in the region. Topics will include the following: compliance issues with recommendations, legal issues with recommendations and audit issues with recommendations.

Tribal Liason - United States Attorney

No course description available at time of print.

Human Trafficking

Subject matter experts from the Bureau of Indian Affairs, U.S. Department of the Interior will provide the latest information on what Human Trafficking is and how to detect and combat this pervasive criminal activity.

Active Shooter Training

Law Enforcement personnel from the Federal Protective Services, U.S. Department of Homeland Security will provide expert advice in developing policies and procedures for an active shooter situation.

Internal Audit: A to Z Approach

Internal Audit is an integral component toward protecting the assets of the gaming operation by examining policies and procedures, testing internal controls and monitoring compliance with policies and regulations. The Internal Audit function can provide information to improve your operation's internal controls. 25 CFR Part 543.23 provides guidance; however, it was never intended to define the Internal Audit function. This is a 2-day course that will discuss the role internal audit plays along with the Tribal Gaming Regulatory Agency (TGRA) and Gaming Operation Management in the protection of assets. Additionally, the importance of planning, testing, documenting and reporting of the internal audit work will be examined to further the understanding of how each element enhances the usefulness of the final product.

TICS/SICS Development

This course will discuss elements of control and how to recognize areas in the TICS and SICS where detailed procedures should be written so that there is a reasonable assurance that assets are protected. It includes application of the concepts through interactive activities that help participants internalize learning so they can apply what they learn upon return to their gaming facilities.

Topics include: Risk, Internal Controls, Regulations, Acronyms, Fraud and Writing TICS/SIC

How to Get the Most Out of This Course

- ❖ **Take the right approach to learning.** To meet each attendee's needs, we provide a number of different learning tools. These include well-researched and professionally prepared materials and presentations by skilled and experienced subject matter experts. Although you'll have a preferred style of learning, we hope you'll take advantage of *all* the tools we offer.
- ❖ **Make a note of this.** This workbook and related materials will enable you to take notes, and have access to needed information. Instead of trying to take notes word-for-word, it is recommended that you list key points for later memory jogging. We will try and ensure you have as much information as you need to lessen the need for lengthy notes.
- ❖ **Don't hesitate, participate.** The course will be more interesting and productive when everyone participates. If you don't understand something, there is a good chance someone else does not either, so do everyone a favor and ask questions. Additionally, don't hesitate to answer our questions and share your relevant knowledge and experience with all of us.
- ❖ **Take a break.** Everyone has a limit to how much they can sit still and absorb. So use the break, network, share ideas, and get some fresh air. You can help keep us running smoothly by coming back on time.
- ❖ **Join in with the group.** Stay enthusiastic and involved.
- ❖ **Attendance.** You must fully attend the course, and where applicable, pass a final exam for full credit and to receive a training certificate. Please do your best to be on time for class and try to be here for the entire course.
- ❖ **Cell phones, PDA's and iPad's.** In an effort to minimize disruptions to class, please turn off all cell phones and PDA's. If they are your only emergency contact, please set them to vibrate. iPad's may be used, but should be for note taking.

Please note: This course is conducted in English with instruction facilitated by verbal and written communications.

Course Structure

The Regional Training Course is a 3 day course developed to provide an encompassing event surrounding current, trending and critical knowledge areas in Indian gaming. Providing full staff learning opportunities, as well as focus area learning tracks, the course is designed to give tribal gaming regulators and operations personnel, commissions and staff a wide variety of subject needs to meet concerns and relevant areas of interest in Indian gaming.

Each instruction topic is focused around identified concern areas, new content and regulations and a variety of mechanisms for change, improvement and compliance for success. Each block focuses on various staff roles and responsibilities, focusing on similarities, differences, and opportunities for collaboration and sharing of practices and improvements. Most topic areas will pair an equal amount of time to facilitated lecture and action based learning.

The primary training methodologies will be interactive lecture, small group discussion, and case study. Action based learning will be facilitated through small groups and case study. Final learning will be measured through exercise completion and observation.

Regional Training Course Agenda



	START TIME	Sacramento Regional Training Course May 16-18, 2017 Jackson Rancheria Casino Resort 12222 New York Ranch Rd, Jackson, CA	
Day One	09:00	Course Opening/Welcome	
	09:15	Panel Discussion - Regional Guidance on the Issues	
	10:30	Tribal Liaison – United States Attorney	
	12:00	<i>Lunch (On Your Own)</i>	
	1:00	Human Trafficking	
	2:30	Active Shooter Training	
	4:00	Day Wrap up, Q&A, Next Day Prep	
Day Two		DAY TWO- TRACKS	
	9:00	Internal Audit: A to Z Approach	TICS/SICS Development
	11:00		
	12:00	<i>Lunch (On Your Own)</i>	
	1:00	Internal Audit: A to Z Approach	TICS/SICS Development
	2:00		
	3:00		
	4:00	Day Wrap up, Q&A, Next Day Prep	Day Wrap up, Q&A, Next Day Prep
Day Three		DAY THREE- TRACKS	
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	1:00	Internal Audit: A to Z Approach	TICS/SICS Development
	2:00		
	3:00		
	4:00	Course Close	Course Close

Sacramento Regional
Guidance on the Issues
May 2017





Sacramento: Regional Guidance on the Issues

Panel Discussion

18 Apr 2017



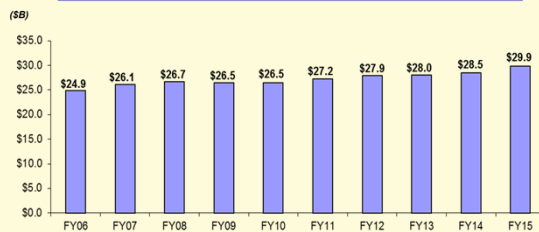
Commission's Initiatives

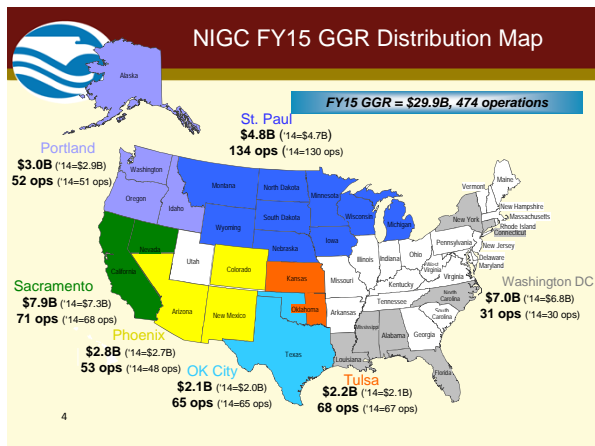
- Rural Outreach
- Staying ahead of the Technology Curve
- Supporting a strong workforce both in-house and among our regulatory partners
- Protect against anything that amounts to gamesmanship on the back of tribes



FY2015 GGR

FY15: Indian gaming industry's largest year-over-year GGR increase during past 10 years.






Sacramento Region

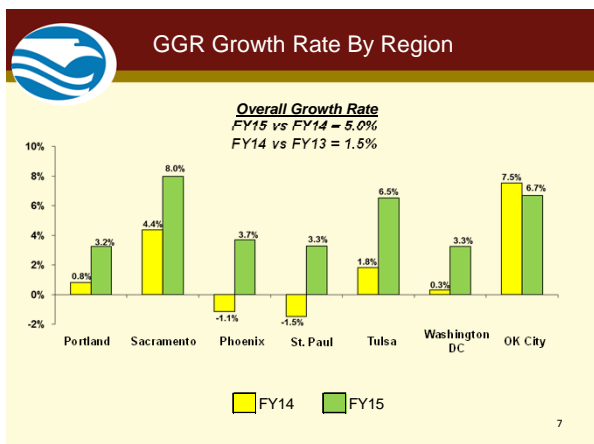
- **California and northern Nevada – Sacramento/ Temecula satellite office**
- 65 Tribes- Operating 73 gaming facilities:

Class II (only)	7
Class III (only)	30
Class II and III	36

Sacramento Region

- **Backgrounds & Licensing**
 - October 2015 to September 2016:
 - Fingerprints Processed – 14,669
 - NORs Received – 11,065
 - NGLI Received – 9,764
 - October 2016 to March 2017:
 - Fingerprints Processed – 11,180
 - NORs Received – 6,343
 - NGLI Received – 8,934





Regional Compliance Issues/Guidance

ISSUE:

- Submissions of Facility License/Attestation
- Submission of NOR/NGLI
- Submission of AFS, Fees & Worksheets
- Internal control compliance
- TGRA/Management/Govt. relationship
- Gamesmanship

GUIDANCE:

- Expiration/Renewal
- Timeliness/Systemic review, Reminders and offer of Assistance
- IA, CPA, Compliance Staff- 543 testing, identify, remedy, follow-up
- NIGC assistance/Site Specific Training
- Review the contracts

Office of General Counsel

Requesting OGC Opinions:
www.nigc.gov/images/uploads/game-opinions/SubmittingRequestforLegalOpinionDec112013.pdf

- Indian Lands
- Game Opinions
- Declination Letters



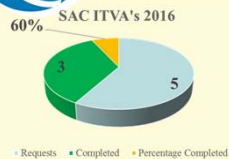
Office of General Counsel

OGC Technical Assistance

- Informal Gaming Ordinance Review
- Regional Training Courses
- Other Questions or Concerns



Technology Division



Common ITVA Issues Identified

- Microsoft Patches not updated
- Virtual Network Computers unsecured
- Remote username/passwords unencrypted

Technology Division provides free IT Vulnerability Assessments that assist with identifying IT Network deficiencies sign up at <http://www.nigc.gov>

2016 Regulating Gaming Trainings (RGT's) Questions

1. Forensics
2. Class II Systems
3. IT Threats

Common Compliance Assessments (ICA's) Issues Encountered

1. Remote Access
2. Policy and Procedures
3. Logical Security – proper username/passwords in place

2016 IT General Interactions

1. Remote Access
2. Network Security
3. Vendor Issues

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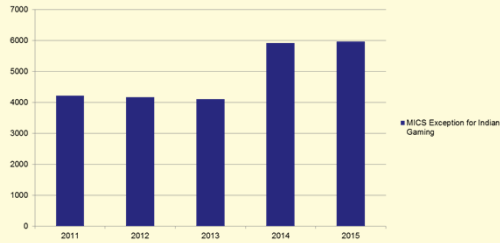
Audit

- Internal Control Assessments
 - Limited Scope review of specific areas



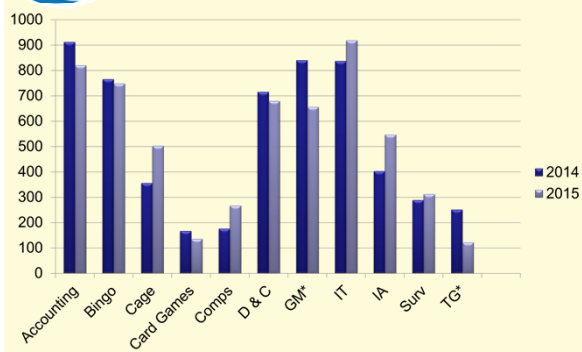
Overall MICS AUP Exceptions

MICS Exceptions for Indian Gaming





Breakdown by Section





543 Tied #5 Finding

- Audit and accounting 543.23(c)(4)
 - Internal audit
 - Controls established and procedures implemented
 - Internal auditor(s) are independent of gaming operations with respect to departments subject to audit (auditors internal to the operation, officers of the TGRA, or outside CPA firm may perform this function)



543 Tied #5 Finding

- Auditing Revenue 543.24(d)(8)(iv)
 - Establish controls and implement procedures:
 - Drop and Count
 - Quarterly, inventory all controlled keys and reconcile to records of keys made, issued, and destroyed
 - Investigate all keys unaccounted for, and document investigation

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543 Tied #5 Finding

- Cage, vault, kiosk, cash and equivalents 543.18(c)(3)
 - Cage and vault accountability
 - Cage/vault inventories must be counted independently by at least two agents
 - Attested by signature
 - Recorded in ink or other permanent form at end of each shift during which the activity took place
 - Agents must make individual counts to compare for accuracy & maintain individual accountability
 - All variances must be documented & investigated

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543 Tied #5 Finding

- Comp services or items 543.13(c)
 - Records must be summarized & reviewed for proper authorization & compliance with established authorization thresholds

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543 Tied #2 Finding

- Auditing Revenue 543.24(d)(8)(i)
 - Establish controls and implement procedures:
 - Drop and Count
 - At least quarterly, unannounced currency counter and currency counter interface (if applicable) test must be performed
 - Document and maintain test results

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543 Tied #2 Finding

- Auditing Revenue 543.24(d)(4)(iii)
 - Establish controls and implement procedures to audit the following operational area:
 - Gaming Promos and Player Tracking
 - Annual review of computerized player tracking systems
 - Ensure configuration parameters are accurate and alterations have authorization from management
 - Review performed by agent(s) independent of individuals that set up/change system parameters
 - Document and maintain the test results.

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543 #2 Finding

- Auditing Revenue 543.24(d)(9)(iii)
 - Controls must be established and procedures implemented to audit of each of the following operational areas:
 - Cage, vault, cash and cash equivalents
 - Twice annually, a count must be performed of all funds in all gaming areas.



543 #1 Finding

- Auditing Revenue 543.24(d)(10)(i)
 - Establish controls and implement procedures:
 - Inventory
 - Monthly, verify receipt, issuance, and use of controlled inventory
 - Includes, but not limited to, bingo cards, pull tabs, playing cards, keys, pre-numbered and/or multi-part forms.

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Summary of 543 findings

- A majority of 543 findings are as it relates to the sections that require;
 - Controls must be established
 - Procedures implemented
 - Thresholds established
 - Actions documented


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NIGC Training Program

- Revising training approach to be more process driven.
 - “How To” instead of “How Come”
- New workshops Internal Audit (16hr training) TICS/SICS
- In the future Learning Management System
- A call for suggestions!

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Questions





Regional Offices

WASHINGTON NATIONAL OFFICE
WASHINGTON, DC 20005
PHONE: (202) 632-7003

PORTLAND REGIONAL OFFICE
PORTLAND, OR 97205
PHONE: (503) 326-5095

SACRAMENTO REGIONAL OFFICE
SACRAMENTO, CA 95814
PHONE: (916) 414-2300


OK CITY REGIONAL OFFICE
OKLAHOMA CITY, OK 73102
PHONE: (405) 609-8626

PHOENIX REGIONAL OFFICE
PHOENIX, AZ 85012
PHONE: (602) 640-2951

TULSA REGIONAL OFFICE
TULSA, OK 74103
PHONE: (918) 581-7925

ST. PAUL REGIONAL OFFICE
ST. PAUL, MN 55101
PHONE: (651) 290-4004

Training Course Evaluation Form

	Course	Regional Guidance on the Issues
	Instructor	

Instructor	Strongly Agree (5)	Agree (4)	Neutral (3)	Disagree (2)	Strongly Disagree (1)
1. The instructor was knowledgeable and well prepared.					
2. The instructor engaged participants and they responded well to questions.					

Please provide specific suggestions or recommendations for the instructor in the space below:

Course Materials	Strongly Agree (5)	Agree (4)	Neutral (3)	Disagree (2)	Strongly Disagree (1)
3. The course content, topics and activities were engaging and met my expectations.					
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Please provide specific suggestions or recommendations for the course content in the space below:

Course Pacing	Strongly Agree (5)	Agree (4)	Neutral (3)	Disagree (2)	Strongly Disagree (1)
5. The course was well paced and there were adequate breaks throughout.					

Please provide specific suggestions or recommendations for the course pacing in the space below:

Overall Course Rating	Excellent	Good	Fair
How would you rate this course overall?			

Overall Course Impression

Please provide any comments, suggestions or ideas to help improve this training course.

Tribal Liason US Attorney



Role of the United States Attorney's Office in California Indian Country

United States Attorney's Office,
Eastern District of California
Phil Ferrari
FAUSA and Tribal Liaison

United States Attorney's Office

- Judiciary Act of 1789**
 - "...to prosecute in [each] district all delinquents for crimes and offenses cognizable under the authority of the United States, and all civil actions in which the United States shall be concerned."
- Principal litigator for the U.S. Attorney General**
 - 93 U.S. Attorneys in U.S. and its territories

Role of the U.S. Attorney

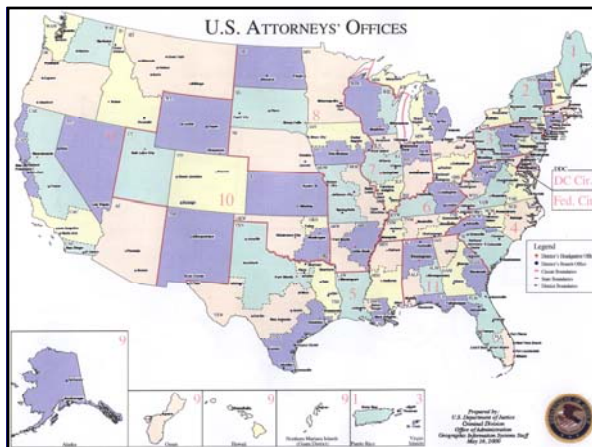
- Three statutory responsibilities (USC Title 28, Section 507)**
 - Prosecution of criminal cases brought by Federal government
 - Prosecution and defense of civil cases in which U.S. is a party
 - Collection of debts owed to Federal government which are administratively uncollectible

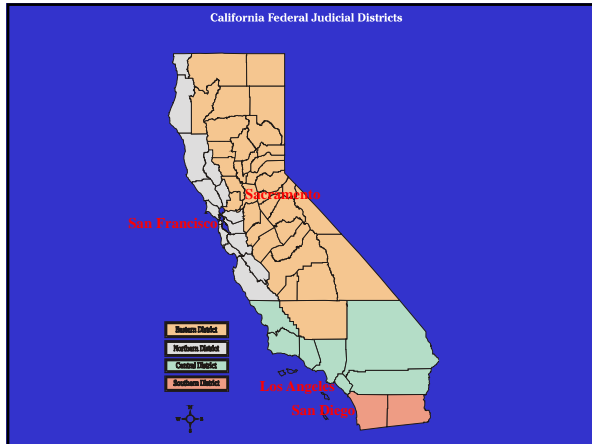
Selection Process For U.S. Attorney

- Nominated by President
- Confirmed by the U.S. Senate
- Serves 4 year term
- Typically resign or asked to resign when new administration comes into office

Assistant U.S. Attorneys

- Assistant United States Attorneys are hired by the U.S. Attorney and appointed by the Attorney General
- Civil service protection
- Only the appointed U.S. Attorney serves at the pleasure of the President





EDCA

- 34 Counties
 - Relationships with local Law Enforcement
- 8 million People
- 43 Federally Recognized Tribes
- 21 Tribal Casinos

DOJ Policy

- Unique Legal Relationship
 - Government to Government
 - Requires Consistent & Effective Communication
- Respect and Promote Tribal Sovereignty
- Commitment to Tribal Self-determination, Tribal Autonomy, Tribal Nation-building, and Maximizing Tribal Control Over Governmental Institutions in Tribal Communities

Tribal Liaison

- Each USAO that is home to a Tribe(s) asked to designate an AUSA to serve as Tribal Liaison.
- Serve as a POC
 - Law Enforcement Matters (Federal and State)
 - Tribal Law Enforcement
 - BIA Commissions / Training
 - District-Wide Law Enforcement Coordination

Tribal Liaison Cont.

- Civil Matters
 - Process Issues
- Federal Government Contacts
- Grant Opportunities
- CONSULTATION

Eastern District of California Phil Ferrari (916) 554-2744

- (S) Alpine, Amador, Butte, Colusa, El Dorado, Glenn, Lassen, Modoc, Mono, Nevada, Placer, Plumas, Sacramento, San Joaquin, Shasta, Sierra, Siskiyou, Solano, Sutter, Tehama, Trinity, Yolo, and Yuba.
- (F) Calaveras, Fresno, Inyo, Kern, Kings, Madera, Mariposa, Merced, Stanislaus, Tulare, and Tuolumne.

EDCA Law Enforcement Coordinator

- Tim Johnstone (916) 554-2701
 - Contacts throughout District
 - Can assist in identifying grant opportunities
 - Law Enforcement Summit
 - Law Enforcement Bulletins

Northern District Annemarie Conroy (415) 436-7200

- Del Norte, Humboldt, Mendocino, Lake, Sonoma, Napa, Marin, San Francisco, Contra Costa, Alameda, San Mateo, Santa Clara, Santa Cruz, San Benito, and Monterey.

Central District Sean Peterson (Riverside) (213) 894-2400

- Los Angeles, Orange, Riverside, San Bernardino, San Luis Obispo, Santa Barbara, and Ventura.

Southern District
Carla Bressler-Keehn
(619) 557-5610

- San Diego and Imperial.

Public Law 280

- CALIFORNIA
- Alaska
- Minnesota
- Nebraska
- Oregon
- Wisconsin

Generally Applicable Jurisdiction

- Section 1152 – Exclusive Federal Jurisdiction
- Section 1153 – Murder, Manslaughter, Kidnapping, Assault, Arson, Burglary, Robbery and other crimes prosecuted in Federal Courts, using State law.

PL 280 Jurisdiction

- Sections 1152 & 1153 do not apply
- Federal Criminal Jurisdiction: Applies Uniformly Throughout California (including Indian Country)
- State Criminal Jurisdiction: Applies in Indian Country, so long as statute is criminal/prohibitory as opposed to civil/regulatory (*Cabazon*, 480 U.S. 202)

Prosecution Priorities

- Less than 2 AUSAs per county in EDCA
- Prioritize use of resources based upon national directives and local conditions
- In each case, determine whether there is a “Substantial Federal Interest”

Blue Collar Federal Crimes – Nationwide Jurisdiction

- * 21 USC § 841 – Narcotics
- * 18 USC § 922(g) – Firearms
- * Human Trafficking / Child Exploitation Offenses



White Collar Federal Crimes – Nationwide Jurisdiction

- 18 USC § 666 Theft of Gov't Funds
- 18 USC § 1028 Identity Theft
- 18 USC § 1956 Money Laundering
- 18 USC § 1341 Mail Fraud
- 18 USC § 1343 Wire Fraud
- 18 USC § 1001 False Statements
- 18 USC § 1956 Money Laundering
& § 1957



THEFT OR BRIBERY CONCERNING PROGRAMS RECEIVING FEDERAL FUNDS-- 18 U.S.C. § 666

- To protect the integrity of the vast sums of money distributed through Federal programs, Congress enacted 18 U.S.C. § 666. The section is designed to facilitate the prosecution of persons who steal money or otherwise divert property or services from state and local governments or private.
- 18 U.S.C § 666 prohibits the embezzlement, stealing, obtaining by fraud or . . . intentional misapplication of property having a value of \$5,000 or more by an agent, typically an employee, of an organization or of a state, local or **Indian tribal government agency** that receives \$10,000 or more annually in Federal assistance.
- The maximum penalty is imprisonment for 10 years and a fine of the greater of \$100,000 or twice the amount obtained in violation of the section.

Indian Country Offenses

- * 18 U.S.C. 1159 – Misrepresentation of Indian Produced Goods
- * 18 U.S.C. 1165 – Hunting, Trapping or Fishing on Indian land
- * 18 U.S.C. 1169 – Obligation to Report Child Abuse
- * 18 U.S.C. 1170 – Trafficking in Native American Remains / Cultural Items

Gaming Related Federal Statutes

* 18 U.S.C. § 1167 – Theft from an Indian Gaming Establishment

- * Use This Statute For Player/Patron Related Thefts
- * Less Than \$1000 = Not more than one (1) year imprisonment.
- * More Than \$1000 = Not more than ten (10) years imprisonment.

* 18 U.S.C. § 1168 – Theft by Officer or Employee Of Indian Gaming Establishment

- * Use This Statute For ANY Casino Employee/Licensee
 - * Non-employees may be charged under §1168 if aiding and abetting or part of a conspiracy. *U.S. v. Bryant*, 664 F.3d 831 (10th Cir. 2012)
- * Less than \$1000 = Not more than five (5) years imprisonment.
- * More than \$1000 = Not more than twenty (20) years imprisonment.



18 U.S.C. § 1163 Embezzlement and Theft from a Tribal Organization

- Makes embezzlement, theft, criminal conversion, and willful misapplication of funds belonging to a tribal organization a Federal crime.
- It is a felony if the amount taken exceeds \$1000, and is subject to imprisonment for a maximum of 5 years, a fine pursuant to 18 U.S.C. § 3571, or both.
- If less than \$100 is involved, the maximum penalty is one year, and/or a fine under 18 U.S.C. § 3571.
- Note: This statute applies to both Indians and non-Indians, and need not be committed in Indian country.

Recent EDCA 1163 Prosecutions

- * *U.S. v. Volen, et al*: Developer hired by United Auburn Indian Community to construct school, community center and offices. Submits false and inflated invoices which are approved by two UAIC employees, who receive kickbacks from developer.
- * All three defendants sentenced to significant prison terms, and ordered to pay \$17 million in restitution to UAIC.
- * *U.S. v. Black*: Finance Director for Pit River Tribe charged with embezzling over \$80,000 from Tribe.
- * Allegation only / Defendant presumed innocent.

Archeological Resources Protection Act (ARPA)

- * Under ARPA, certain activity on public or Indian lands is prohibited:
 - * a. Excavation, removal, damage, alteration, or defacing
 - * b. Of any archaeological resource
 - * c. Located on public or Indian lands
 - * d. Without special permit or exemption
- * Certain activity off public lands involving the sale of archeological resources is prohibited
- * Violations under ARPA must be intentional violations: "Any person who knowingly violates"- 16 U.S.C. § 470ee (d)
- * Multiple Exceptions

Recent EDCA ARPA Cases

- * *U.S. v. Bourne* (2016): Involving artifacts from Humboldt-Toiyabe National Forest and Death Valley (Timbisha Shoshone)
- * *U.S. v. Harp* (2016): Involving depredation of petroglyphs in Sequoia National Forest (Tubatulabal)
- * *U.S. v. Starks* (pending): Involves alleged removal of Native American artifacts from Lone Pine area of Inyo County
- * *U.S. v. Cassayre* (2013): Involving artifacts from BLM lands in Modoc County (Pit River)
- * *U.S. v. Korb* (2011): Involving artifacts from Death Valley National Park

Child Exploitation Offenses

- * Child Pornography & Sexual Exploitation of Children
 - * Often there is Federal jurisdiction
 - * Generally requires some inter-state nexus

Human Trafficking

- * "Human Trafficking" is the obtaining or maintaining of another person in a condition of compelled labor or service.
- * Key is compulsion, through force, fraud or coercion
- * Labor and/or Sex Trafficking
- * Victims Often Hesitant to Come Forward


Intra-Tribal Conflicts

- * Respect for Sovereignty Means General Policy of Non-Intervention
- * Top Priority in ALL Cases is Public Safety

QUESTIONS?



Training Course Evaluation Form

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	Instructor	

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Human Trafficking





Human Trafficking

National Indian Gaming Commission
Sacramento, CA
May 16, 2017



Presented by:

Valaura Imus, Supervisory Victim Specialist, BIA

Learning Objective

Please understand that some of the information that you will hear and view contains graphic images and language as the information is taken from actual web sites that are used in the solicitation process.

- Introduction to human trafficking in tribal communities.
 - Increase your awareness
 - Provide definitions of human trafficking
 - Learn how to identify potential victims
 - Understand the mindset of victims

Ask Yourself

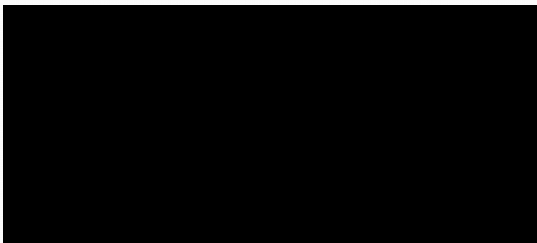
- Do you believe that human trafficking is happening in your community?

What is your knowledge on trafficking?



1 = lack any knowledge
10 = know everything about trafficking

Native American Trafficking – Video (8:16)



Statistics

- Trafficking is a continuation of a lengthy history for Native people, with colonization of America through wars, forced removal from homelands to reservations, boarding schools and forced urban relocation.

Commercial Sex Trade Data

- A review of community impact data taken from four formal studies demonstrates the disproportionate impact the commercial sex trade has on indigenous communities in both the U.S. and Canada.
 - In Hennepin County, Minnesota, roughly 25 percent of the women arrested for prostitution identified as American Indian while American Indians comprise only 2.2 percent of the total populations.
 - In Anchorage, Alaska, 33 percent of the women arrested for prostitution were Alaska Native, but Alaska Natives make up only 7.9 percent of the population.

Statistics (cont.)

- Canadian studies show similar results.
 - In Winnipeg, 50 percent of adult sex workers were defined as Aboriginal, while Aboriginal peoples comprise only 10 percent of the population and 52 percent of the women involved in the commercial sex trade in Vancouver were identified as First Nations, while First Nations people comprise only 7 percent of the general population.
 - Although many individuals involved in prostitution are not victims of sex trafficking, it is telling that Native women are so disproportionately represented among the population. It is necessary to examine what leads these women to this work and whether they have any other viable opportunities for economic advancement within their communities.

Source: Human Trafficking Center Blog 2/14/17; Victoria Sweet, JD

22 U.S. Code Chapter 78

Trafficking Victims Protection Act (TVPA)

- The Trafficking Victims Protection Act is the most important anti-trafficking law ever passed. The TVPA, criminalized human trafficking with its passage in 2000 and establishes victim protection for men, and women, adults and children, citizens, and non-citizens alike.
- Establishes a three-prong approach prevention, protection and prosecution.
 - §7101. Purposes and findings
 - (a) The purposes of this chapter are to combat trafficking in persons, a contemporary manifestation of slavery whose victims are predominantly women and children, to ensure just and effective punishment of traffickers, and to protect their victims.

Definitions

Sex Trafficking

The recruitment, harboring, transportation, provision, obtaining, patronizing, soliciting, or advertising of a person for a commercial sex act induced by **force, fraud, or coercion**, or in which the person induced to perform such an act has not attained 18 years of age.

- Under 18 years of age it is a crime, and law enforcement does not have to prove force, fraud or coercion.

Labor trafficking

The recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of **force, fraud, or coercion** for the purpose of subjection to **involuntary** servitude, peonage, debt bondage, or slavery.

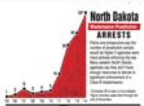
Examples of Sex and Labor Trafficking

SEX TRAFFICKING:

Child sex tourism, massage parlors, street prostitution, recruitment of tribal members from casinos into city limits; parents trading children for food, drugs, alcohol, wood, utilities, runaway or homeless youth (aging out of foster care) "man camps".

LABOR TRAFFICKING:

Agriculture, begging/street peddling, beauty salons, construction, custodial work, elder care, exotic dancing, food industry/restaurant work, traveling sales crews, oil fields, etc.



A-M-P Model

Action*	Means **	Purpose
RECRUITS	FORCE	A Commercial
HARBORS	Physical assault, sexual assault, confinement	
	FRAUD	Sex Act
TRANSPORTS	False promises about work/living conditions, withholding promised wages	Labor or
PROVIDES	COERCION	Services
OBTAINS	Threats of harm or deportation, debt bondage, psychological manipulation, confiscation of documents	

* Additional actions that constitute sex trafficking, but not labor trafficking, include patronizing, solicits, and knowingly advertising.

** Neither force, nor fraud, nor coercion are required to be shown for minors under the age of 18 induced into commercial sex acts.

Casino & Hotel

Identifying Victims of Human Trafficking

- Guest appears to be disconnected from individual, family, friends, etc.,
 - May have visible brandings
 - Lacks luggage, overnight bag
 - Rents more than one room; (working/trafficker rooms)
 - May lack identification
 - Uses entrances other than the front door
- Controlled movement
- May refuse cleaning services
- When room is cleaned, there is an unusual amount of condoms, lubricant and hand towels
- May have several phones/laptops in the room
- May have excessive pornographic TV purchases
- Transactions are completed in cash

Reference: K. Brown (2007). Hotel & Casino PPT

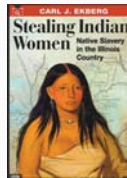
Who Are the Victims



They look for people who are susceptible including: Poverty, psychological or emotional vulnerability, economic hardship, lack of social net, suffered multiple victimizations, substance/alcohol abuse, homeless/runaways, etc.

The trauma caused by the traffickers can be so great that many may not identify themselves as victims or ask for help, even in highly public settings.

- Recruitment by "Romeo/boyfriend" pimps
- Gang related prostitution
- Parent or family member pimping for drugs/money



Understanding the Mindset of a Victim



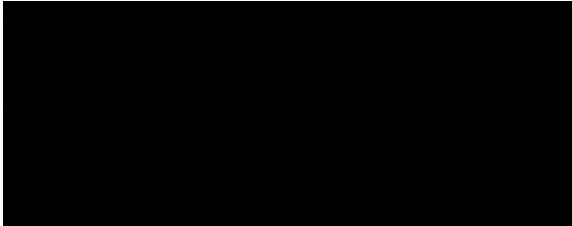
- Victims often don't see themselves as victims.
- Victims may feel shame, self-blame and feeling of unworthiness
- Victims may be coached to lie (give fabricated histories/scripted stories)
- Victims are fearful and distrust law enforcement and government services due to fear of arrest.
- Victims may have formed a trauma bond with their exploiter and may have deep loyalties and positive feeling for their abuser.
- Drugs often play a role in sex trafficking situations- sometimes as a way to cope or victims sometimes enter "the life" to support a drug habit.

What is the Connection

- Intimate partner violence is NOT asked for.
- Human trafficking is NOT voluntary.
- Perpetrators use a relationship of trust to their advantage (e.g. economic gain through a girlfriend or employee).
- Abusers and traffickers can be anyone.
- Victims can be ANYONE (e.g. children, women and men of all nationalities, socio-economic status, race, age, and faith).
- Perpetrators and traffickers often threaten victims into a life of silence and compliance.
- Intimate partner violence and human trafficking violate a person's freedom.
- Victims may have experienced attacks of violence across their lifespan: street violence; sexual assault, war; political turmoil

Victims/survivors need assistance from various people, agencies, and organizations.

Human Trafficking in Montana: Part 2 (4:16)



Source: Completed at ABC FOX Montana, Great Falls, June 7, 2016

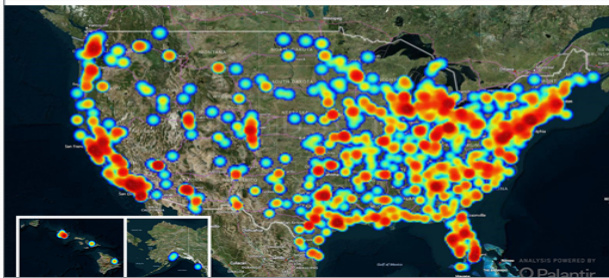
How You Can Help

- Learn the indicators of human trafficking.
- Report suspicions to law enforcement by calling 911 or 24-hour National Human Trafficking Resource Center line at 1-888-373-7888.
- Be a conscientious and informed consumer.
- Volunteer and support anti-trafficking efforts in your community.
- Met with and/or write to your local, state, federal and tribal government representatives.
- Host an event to watch and discuss films about human trafficking.
- Be well-informed.
- Work with local religious communities.
- Businesses: provide jobs, internships, skills training, and other opportunities to trafficking survivors.
- Train Casino Personnel – employee orientation, badge replacement, etc.

Why?

- Potential for trafficking recruitment increases in tribal casinos.
 - Adjacent to city
 - Accessibility to interstates
 - Commercial sex trade is an industry based model
 - Operations respond to market forces (categories of customers/venues)

Over 7,500 Human Trafficking Hotline Cases in 2016 in the U.S.



Human Trafficking brings easy money, hard lives for Teenage Girls

February 25, 2014 12:12 AM
Filed Under: Human Trafficking, Sex Trafficking




Federal investigators say:

- Sacramento is Northern California's gateway for human trafficking in part because of its location. The Interstate 80 corridor makes moving people easy.
- It is centrally located to: Reno, Sacramento, East Bay to San Francisco down to San Jose
- Greyhound is the cheapest or Amtrack ticket to get where you need to go.
- Circuit extends beyond to places like San Diego, Orange County, Las Vegas, the Midwest and back east.

[illegible]

Polaris


Contact the National Hotline?




1-888-373-7888

CONFIDENTIAL | TOLL-FREE | 24/7


Contact the National Hotline




CALL TOLL-FREE
1-888-373-7888, 24/7
200 languages



SEND AN
EMAIL
help@polaris.org
24/7




REPORT A TIP
ONLINE
data.polaris.org/tips
24/7



VISIT THIS HOTLINE
WEB PORTAL
www.polaris.org
24/7

Polaris

Contact BEFREE



Text "HELP" or "INFO" to:

233733 (BEFREE)

CONFIDENTIAL | MON-SUN | 3-11PM

California Resources

- Northern California Resources**
 - [Annie Cannons](#) (San Francisco)
 - Annie Cannons provides survivors of human trafficking training in computer programming. Students earn income by working on projects in a safe, supportive, and nondiscriminatory environment.
 - [API Legal Outreach](#) (San Francisco)
 - Provides culturally competent and linguistically appropriate legal representation, social services, and advocacy for the most marginalized segments of the community including low-income workers, seniors, recent immigrants, and youth. API Legal Outreach, directed by its community-based model, works to level long-standing barriers that have denied Asians and Pacific Islanders equal justice and equal access to our legal system.
 - [Bill Wilson Center](#) (Sacramento)
 - provides housing, education, counseling and advocacy services to children, youth, and families. (San Clara County).
 - [Community Violence Solutions](#) (CVS)
 - works in partnership with the community to end sexual assault and family violence through prevention, crisis services, and treatment. CVS serves all of Contra Costa and Marin Counties. (San Pablo) Community Against Sexual Harm Cashac.org assists victims of sexual exploitation through survivor-led peer support, harm reduction services and community education.
 - [Freedom House](#) (Santa Clara County)
 - provides a safe home and long-term aftercare services for survivors of human trafficking. Freedom House operates The Monarch, the first safe home in Northern California for adult female survivors of human trafficking, and The Nest, a residential shelter for minors.
 - [Huckleberry House](#) (San Francisco and Marin)
 - educates, inspires, and supports underserved youth in developing healthy life choices by providing them and their families with a network of services and opportunities.
 - [Legal Aid at Work](#) (San Francisco)
 - Legal Aid at Work has provided crucial free legal services to low-income people for more than a century through free legal clinics and helplines; by providing free trainings and extensive legal information online; by bringing individual and class actions and impact litigation; and by advocating for policy change.

9

California Resources


- [My Sister's Place](#) (Sacramento)
- serves Asian and Pacific Islander and other underserved women and children impacted by domestic violence, sexual assault, and human trafficking by providing a culturally sensitive and responsive safe haven, job training, and community services.
- [New Day For Children](#)
- partners with law enforcement, social services, educational institutions, churches, corporations and other community leaders to financially support parents or legal guardians who have enrolled children in programs and facilities to give hope and security to girls from ages 10-18 caught up in CSEC activity.
- [Opening Doors](#)
- Opening Doors Inc. works to empower refugees, immigrants, human trafficking survivors, and underserved Sacramento area residents to achieve self-sufficiency by accessing opportunities to mainstream economic and social systems. Opening Doors provides case management and immigration legal services for survivors of human trafficking, as well as outreach, education and technical assistance to those who may encounter human trafficking victims in the greater Sacramento region. Opening Doors also manages the Sacramento Rescue and Restore Coalition.
- [Stand Up Placer](#)
- Stand Up Placer is the state-certified Rape Crisis, Domestic Violence and Human Trafficking agency for Placer County. Stand Up Placer provides advocacy, crisis intervention, emotional support, legal counseling, therapy, housing, transportation assistance, and accompaniment services to medical facilities for SART exams, police stations and on-scene with law enforcement for human trafficking victims.
- [Surviving Against Global Exploitation](#) (SAGE) Project (San Francisco)
- is one of the few organizations that is survivor-centric, and is designed and run predominantly by survivors. SAGE offers legislators, law enforcement, and other agencies interested in CSE information, a valuable survivor-oriented perspective.
- [San Francisco Network Mapping](#) (San Francisco)
- SafeHouse is a clean and sober living community that supports and empowers victims of human trafficking.
- [WEAVE, Inc.](#) (Sacramento)
- provides crisis intervention services for survivors of domestic violence and sexual assault in Sacramento County. Through its involvement in the Rescue & Restore Coalition, WEAVE also provides outreach and services for international and domestic victims of human trafficking.
- [West Youth Center](#) (Sacramento)
- provides resources and support to homeless youth.

Questions

Thank you

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2600 N. Central Avenue
Phoenix, AZ 85004
602-379-6958
Valaura.imus@bia.gov

Training Course Evaluation Form

	Course	Human Trafficking
	Instructor	

Instructor	Strongly Agree (5)	Agree (4)	Neutral (3)	Disagree (2)	Strongly Disagree (1)
1. The instructor was knowledgeable and well prepared.					
2. The instructor engaged participants and they responded well to questions.					

Please provide specific suggestions or recommendations for the instructor in the space below:

Course Materials	Strongly Agree (5)	Agree (4)	Neutral (3)	Disagree (2)	Strongly Disagree (1)
3. The course content, topics and activities were engaging and met my expectations.					
4. I found the information provided in the course to be valuable and I should be able to apply it to my job.					

Please provide specific suggestions or recommendations for the course content in the space below:

Course Pacing	Strongly Agree (5)	Agree (4)	Neutral (3)	Disagree (2)	Strongly Disagree (1)
5. The course was well paced and there were adequate breaks throughout.					

Please provide specific suggestions or recommendations for the course pacing in the space below:

Overall Course Rating	Excellent	Good	Fair
How would you rate this course overall?			

Overall Course Impression

Please provide any comments, suggestions or ideas to help improve this training course.

Active Shooter Training



ACTIVE SHOOTER AWARENESS

National Indian Gaming Commission
Sacramento Regional Training Course
Jackson Rancheria Casino Resort, CA
May 2017





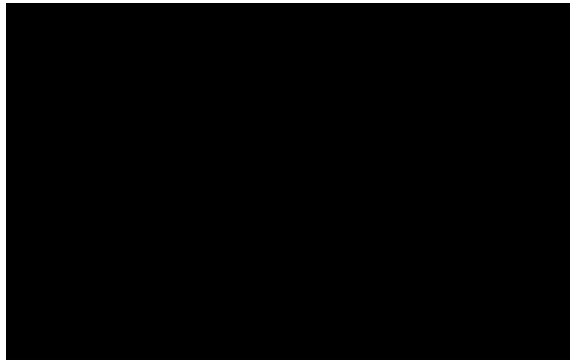
**Homeland
Security**

Federal Protective Service HQ
Specialized and Advanced Training
Weapons and Tactics Branch
Consolidated Training Facility
(703) 235-6170

CHRIS YINGLING
Weapons & Tactics Branch / Chief
christopher.s.yingling@hq.dhs.gov

DAVID POWDERLY
Law Enforcement Specialist / Senior Instructor
david.powderly@hq.dhs.gov

RUN > HIDE > FIGHT Video



3

Today's Discussion

- Active shooter statistics and previous incidents
- Evolution of police response
- How YOU react to an active shooter
 - Run, Hide, Fight
 - Facility lockdown procedures
- Emergency response planning
- What to do when law enforcement arrives



4

DHS definition of active shooter:

"an individual actively engaged in killing or attempting to kill people in a confined and populated area; in most cases, active shooters use firearm[s] and there is no pattern or method to their selection of victims."



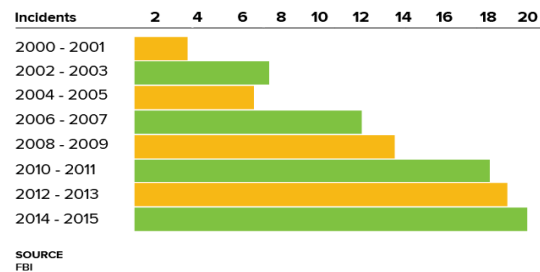
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Deadliest mass killings in U.S history

- PULSE NIGHTCLUB Orlando, FL June 12, 2016
50 Killed, 53 Wounded
Suspect killed by SWAT after taking hostages
- VIRGINIA TECH Blacksburg, VA April 16, 2007
32 Killed, 23 Wounded
Suspect committed suicide
- SANDY HOOK Newtown, CT Dec 14, 2012
27 Killed, 1 Wounded
Suspect committed suicide



Average # of Active Shooter Incidents on the rise per year



SOURCE
FBI



7

Active Shooter Incidents 2014-2015

- 40 total incidents over a 2 year span
- 231 Casualties,
 - 92 Killed, 139 Wounded (excluding the shooters)
 - Inland Regional Center, San Bernardino – 14 killed, 22 wounded
 - Isla Vista, CA – 6 killed, 14 wounded
 - 4 Law Enforcement officers (LEO) Killed and 10 Wounded in 6 Incidents
 - 3 Unarmed Security Guards Wounded
- 6 Incidents ended when citizens acted to end the threat
- 26 incidents ended with Law Enforcement at the scene
- 42 Shooters
 - 39 male, 3 female (2 husband-and-wife teams)
 - 16 Shooters committed suicide, 14 killed by LEOs, 12 Shooters Apprehended



8

Active Shooter Incidents 2014-2015

LOCATIONS

- 15 in areas of Commerce
 - 9 in business environments generally open to pedestrian traffic - 23 killed, and 38 Wounded
 - 3 in businesses closed to the general public - 3 killed, 8 wounded
 - 3 in malls - 3 killed, 9 wounded
- 6 in a variety of different open space locations
- 19 in other environments
 - (schools, Fed Property, health care, religious)



9

Previous Casino Shootings Nationwide

- **Sept 2016 – CEASAR'S CASINO, Atlantic City, NJ**
 - One Killed and 2 Police Officers shot and critically wounded investigating "criminal activity" which turned out to be a robbery.
 - 1 suspect killed and 2 taken into custody
- **Apr 2016 – POTAWATOMI HOTEL AND CASINO, Milwaukee, WI**
 - Individual fires shots over what he believed was a stolen vehicle and then inside at the "High Rollers" tables and described patrons as "Snakes" after stealing chips.
 - Suspect taken into custody
- **Mar 2015 – EMERALD QUEEN CASINO, Tacoma, Wash**
 - Suspect was driving around in parking lot confronting people with firearm. When confronted by another driver, suspect shot and killed him and drove away.
 - Suspect later taken into custody



10

Previous Casino Shootings Nationwide

- **Oct 2013 – BALLY'S HOTEL and CASINO, Las Vegas, NV**
 - 1 killed and 2 wounded, over an argument of cover charge.
 - Suspect tackled by Security and taken into custody
- **July 2011 – MUCKLESHOOT CASINO – Auburn, Wash**
 - 7 shot and Wounded, after suspect allegedly seeing his wife with another man.
 - Suspect tackled by security and taken into custody
- **Aug 2007 – NEW YORK NEW YORK HOTEL CASINO, Las Vegas, NV**
 - "Distressed" Gunman on balcony opens fire (6 Shots) on gamblers below, Wounding 4.
 - Suspect tackled by military patrons and taken into custody



11

The Evolution of Police Response



12

What Is Situational Awareness?

Situational awareness involves being aware of your surroundings and the environment.

The ability to identify, process, and comprehend information about what is occurring or about to occur and how one's own actions will impact both immediate and future outcomes.



Potential Indicators of Violent Behavior:

- Is there any previous behavior or emotional state that raises a "Red Flag"??
- "Watch List"; Disgruntled persons or complaint file

Pre-Attack Indicators

- What are some signs / signals that person presents that are possible out of the ordinary?

Armed Robbery v. Active Shooter

- What are some signals / signs and or differences between the two?
- What are the differences in your actions?



14

How do **YOU** respond to an active shooter?

Your location and the location of the incident dictate your actions!

- RUN
- HIDE
 - Cover v. Concealment
- FIGHT



15

Building Lock Down Procedures

- Activate the emergency plan
- Lock doors
- Communicate
- Use signals and/or codes if rehearsed
- Determine a Safe Area
- Account for employees
- Do not open door until police arrive



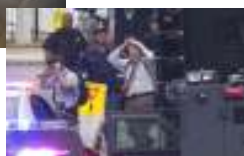
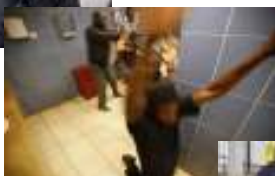
16







When Law Enforcement Arrives



What are Soft Targets?

- Typically defined as publicly accessible locations that are not generally "fortified."
- Recognize that any soft target is vulnerable to an act of violence / terrorism
- You CAN dramatically reduce your risk profile and provide for a safer, more secure facility by identifying policies and procedures that can effectively address acts of violence and terrorism



How can we harden Soft targets?

- Safety, Security and Emergency Plans
- Conduct a comprehensive vulnerability assessment to identify weaknesses in your current facility emergency action plan
- Assess the facilities security and life safety product inventory



What Is Your Role?

- Be Vigilant (Be Present & Observe)
- Should you Intervene?
- What resources do you have?
 - What are Security forces doing?
 - Camera surveillance
 - Signals, codes
 - Prior training, drills
- Notify and Communicate Information
- Take Control
 - Assist the public in escaping the threat
 - Alert occupants and provide assistance (evacuate or shelter in place)
 - Render aid



After the Incident?

- Closures? What, and for how long?
 - Remember it is now a Crime Scene
 - Return to Normalcy
- Loss of Business
- Media
- Public Relations
- Counseling
- After Actions / Lessons Learned



Plan, Plan, Plan!

Chaos, panic and fear can never be eliminated. But they can be minimized and controlled when there is preparation, planning and rehearsal prior to the event that causes them.

Success depends upon previous preparation, and without such preparation there is sure to be failure."
~ Confucius




25

Questions and Answers



26

Training Course Evaluation Form

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	Instructor	

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How would you rate this course overall?			

Overall Course Impression

Please provide any comments, suggestions or ideas to help improve this training course.

TICS & SICS Course

Day 1





KEY POINTS

My Notes

TICS & SICS 2-Day Course Participant Guide



Welcome and Classroom Norms

- Time
- Phones
- Participation



2

KEY POINTS

Classroom Norms:

1. Start and end on time with regular breaks.
2. Silence cell phones and take necessary calls outside of the classroom.
3. Be prepared to participate by:
 - asking and answering questions
 - brain storming
 - working in groups.

My Notes

TICS & SICS 2-Day Course Participant Guide



Knowledge Reviews & Course Evaluations

Knowledge Review Purpose

- Check for immediate understanding and retention
- Used to improve courses
- Provide your name & email address
- Completed twice:
 - at the end of the course
 - 90 days after course via email

Evaluation Purpose

- Allow participants to provide immediate feedback on their experience
- Encouraged to include ideas and recommendations
- Will be used to improve the course

3

KEY POINTS

My Notes

TICS & SICS 2-Day Course Participant Guide



Activity – Why are you here?



4

KEY POINTS

Why are you here?

The need for this training was determined based on the number of inquiries related to TICS/and SICS development for operations along with the increasing findings related to external reporting in the AUP with respect to a lack of controls being established and procedures being implemented.

My Notes

TICS & SICS 2-Day Course Participant Guide



Participating with Poll Everywhere



Poll Everywhere

1



Leader asks a question

2



Participants respond

3



Responses are displayed immediately!

5

KEY POINTS

At the end of the presentation we will be asking you a poll question and we would like to practice using the Poll Everywhere.

Your participation is voluntary and your responses are anonymous.

My Notes

TICS & SICS 2-Day Course Participant Guide



Using Your Phone to Participate

1. Text **NIGC** to **22333** to join the session.
2. Then text your response to the question: **How did you travel to the conference?**
 - A. Plane
 - B. Train
 - C. Car
 - D. Foot/Bicycle



KEY POINTS

We're going to have a practice poll question so you get used to using Poll Everywhere.

1. Text **NIGC** to **22333** to join the session.
2. Then text your response to the question:

How did you travel to the conference?

- A. Plane
- B. Train
- C. Car
- D. Foot/Bicycle

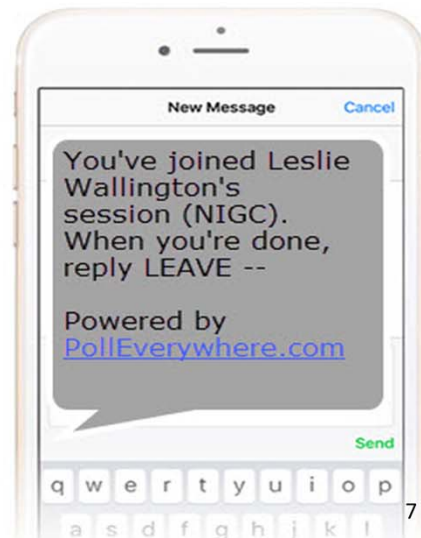
My Notes

TICS & SICS 2-Day Course Participant Guide



Using Your Phone to Participate

1. You will receive a text message confirming that you are in the polling session.
2. Do **NOT** select the PollEverywhere.com link.
3. Now you can enter your response to the poll as a text message.

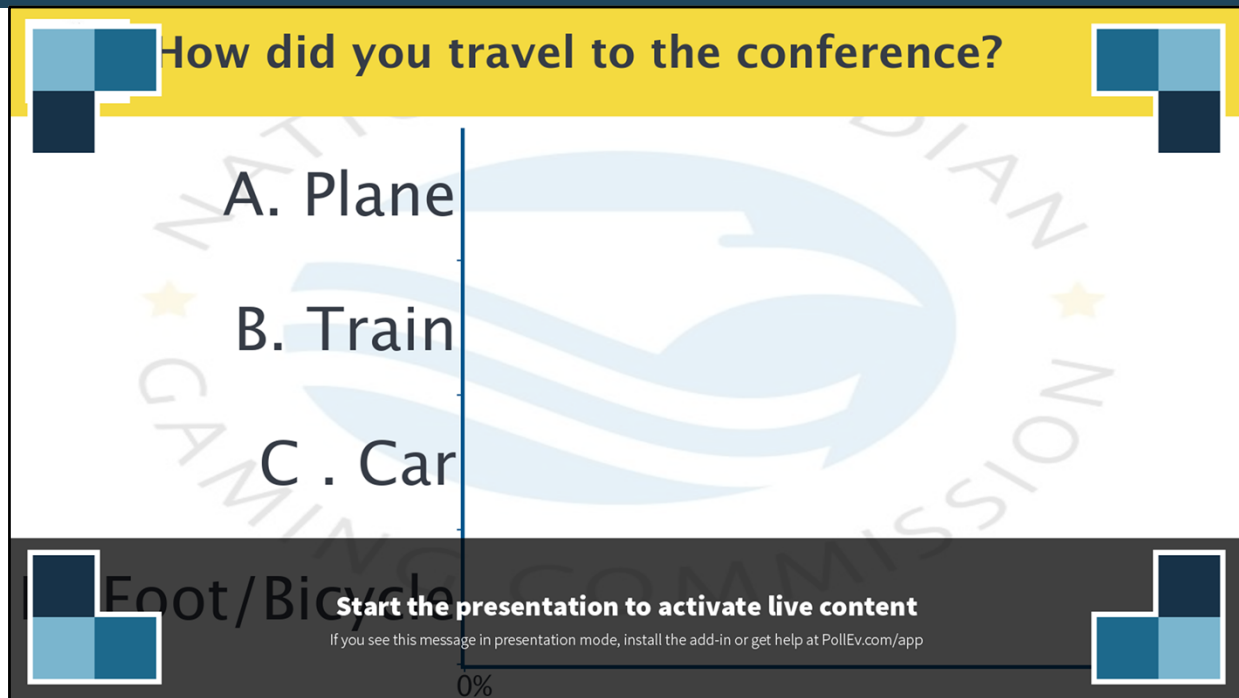


KEY POINTS

After your first text sent to 22333 you will receive a confirmation message.
Do NOT select the link included here.
Simply respond to the poll listed on the PowerPoint.

My Notes

TICS & SICS 2-Day Course Participant Guide



Poll Title: **How did you travel to the conference?**

- A. Plane
- B. Train
- C. Car
- D. Foot/Bicycle

My Notes

TICS & SICS 2-Day Course Participant Guide



Main Ideas



KEY POINTS

The NIGC MICS was written with the intent of allowing tribes the autonomy to create standards specific to their operations. Where previous MICS were regulatory driven the intent was to allow tribes the flexibility to create something that works for them. This course is designed to give you the tools to take back to your properties and review, develop, and implement a quality set of controls to help ensure regulatory compliance of your operation and ultimately protection for the assets of your operations.

My Notes

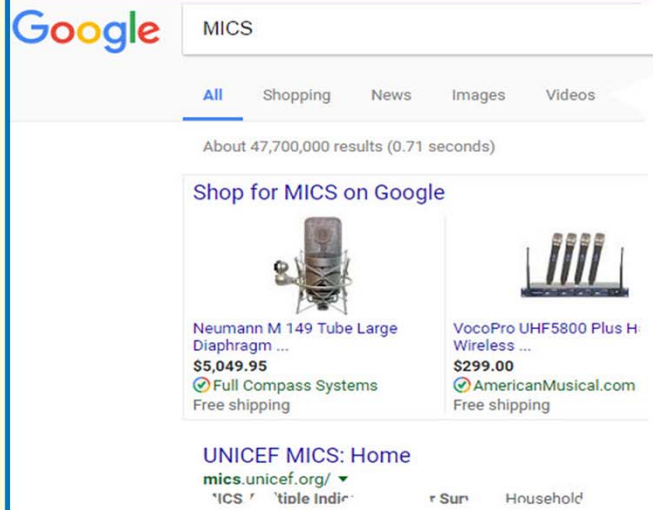
TICS & SICS 2-Day Course Participant Guide



/'akrə_nim/.. WAIT.. WHAT?!!

ac·ro·nym

an abbreviation
formed from the
initial letters of
other words and
pronounced as
a word.



KEY POINTS

Acronyms are used in every organization but are not always universal. If you Google MICS you will find your results are microphones and statistics “Multiple Indicator Cluster Surveys”.

My Notes

TICS & SICS 2-Day Course Participant Guide



Regulations

TICS

SICS

Laws and
Ordinances

NIGC MICS

11

KEY POINTS

- **Laws and ordinance** include state, tribal, and federal laws including the Tribal Ordinance.
- **MICS** – Minimum Internal Controls Standards
- **TICS** – Tribal Internal Control Standards
- **SICS** – System of Tribal Controls

Understanding why regulations are written with specific language and why NIGC MICS was written using flexible language.

My Notes

TICS & SICS 2-Day Course Participant Guide



Regulations



12

KEY POINTS

What regulations are Tribes gaming operations required to follow? Can you think of some?

State Compact, Tribal Ordinance, Act or Code, NIGC MICS, SICS and TICS.

Some regulations are written with less specificity and provide basic control over a process.

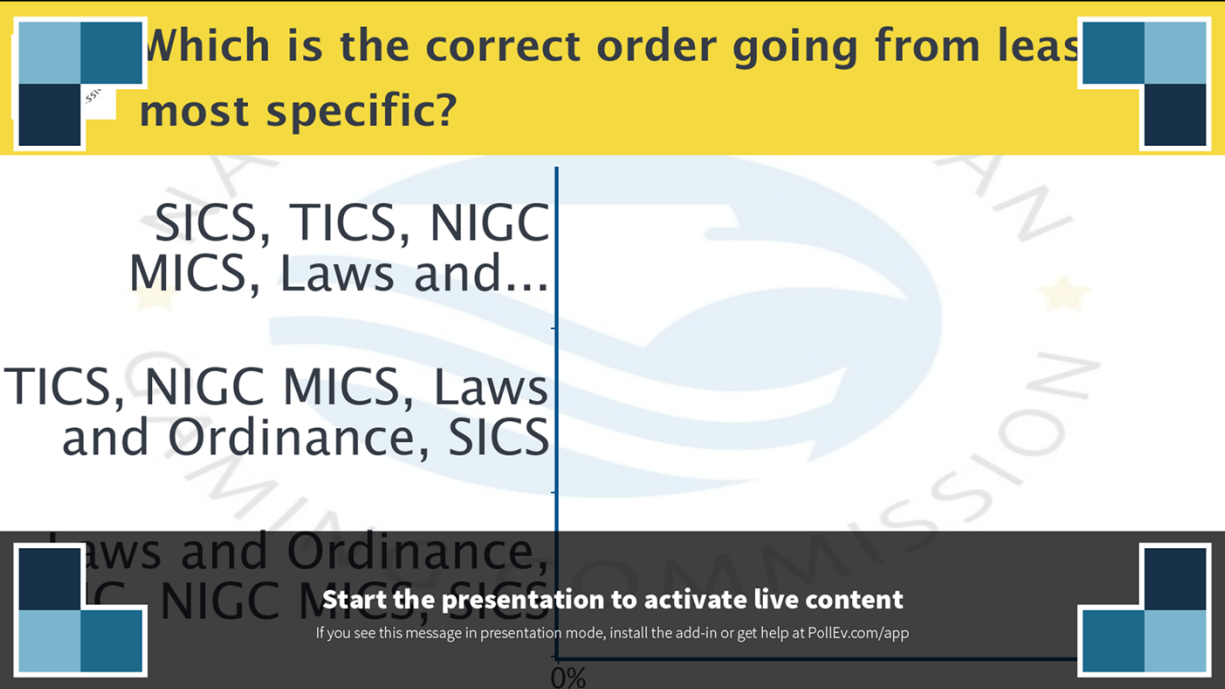
These regulations are usually very minimal, provide less detail and are adopted and written by someone who does not perform the task, but is responsible for protecting the assets.

The next level of regulations are more specific, but still allows flexibility and provides the working parameters for the operations.

The most specific regulations are usually written by someone who is responsible for performing the task and protecting the asset.

My Notes

TICS & SICS 2-Day Course Participant Guide



Poll Title: **Which is the correct order going from least to most specific?**

- A. SICS, TICS, NIGC MICS, Laws and Ordinance
- B. TICS, NIGC MICS, Laws and Ordinance, SICS
- C. Laws and Ordinance, TIC, NIGC MICS, SICS

My Notes

TICS & SICS 2-Day Course Participant Guide



Regulation Pyramid – How do they stack up?



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KEY POINTS

Laws and ordinance include state, tribal, and federal laws including the Tribal Ordinance.

More detail is then added to the **NIGC MICS** to create a system of minimum internal controls. This document is used by many operations and is written to be expanded upon based on the needs of each unique facility.

The **TICS** should be a little more specific and add controls specific to the operation.

The **SICS** are the most specific document. They usually have enough detail included so a new employee could perform the task.

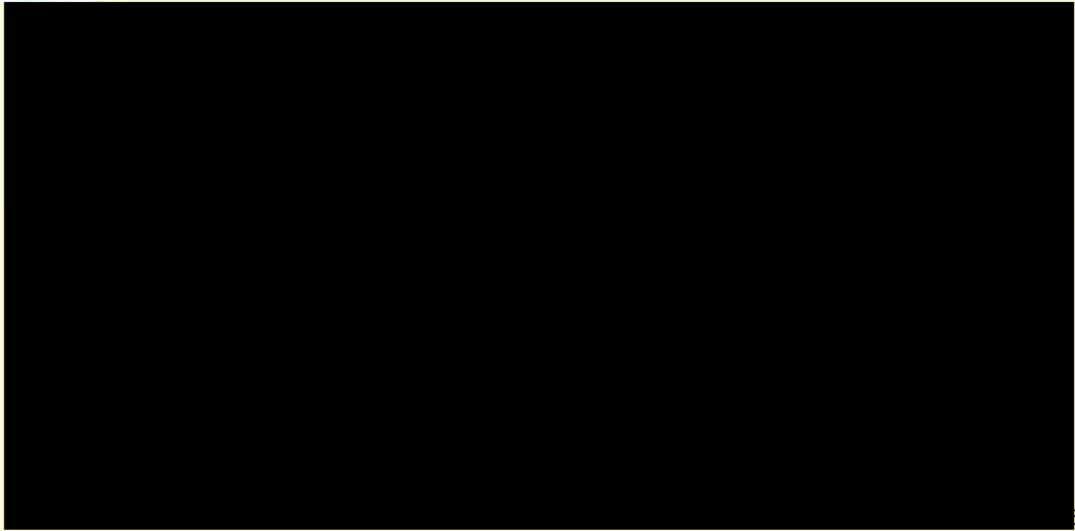
Main point: understanding why regulations are written with specific language and why. Why NIGC MICS was written using flexible language.

My Notes

TICS & SICS 2-Day Course Participant Guide



Introduction to Fraud



6

KEY POINTS

My Notes

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What is the Fraud Triangle?



KEY POINTS

My Notes

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Fraud Triangle



<https://www.procurious.com/procurement-news/throwback-thursday-fraud-triangle>

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KEY POINTS

- Internal controls provide reasonable assurances for asset protection, risk mitigation and reduction in opportunities.

My Notes

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AFCE Fraud Infographic

THE STAGGERING COST OF FRAUD

CFES ESTIMATE THE TYPICAL ORGANIZATION
LOSES 5% OF ANNUAL REVENUES TO FRAUD



18

KEY POINTS

Fraud is one of the reasons a business loses money.

The Association of Certified Fraud Examiners "2016 Report to the Nation" showed a positive correlation between the strength of controls and the loss of revenue through fraud.

My Notes

TICS & SICS 2-Day Course Participant Guide



Internal Controls

What do they do?

- Provide reasonable assurance.
- Helps mitigate risk.
- Helps management achieve organizational goals.
- You can add preventive controls or detective controls.



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KEY POINTS

My Notes

TICS & SICS 2-Day Course Participant Guide



Activity – Internal Controls Brainstorming

What are some internal controls that can limit or minimize the opportunity for fraud in your organization?



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KEY POINTS

Contribute to the classroom discussion by answering this question.

ACTIVITY – What are some internal controls that can limit or minimize opportunity for fraud in your organization?

Discussion

TIME: 20 minutes

Supplies:

- Large Post it note
- Marker

Instructions:

1. Presenter will conduct a discussion on minimizing opportunity.
2. Participant responses will be captured on a large Post It note.
3. Participants can document responses on this hand out.

My Notes

TICS & SICS 2-Day Course Participant Guide



Internal Control Examples

- Authorizations
- Limiting access
- Inventory control
- Dual counts
- Independence
- Signature controls
- Segregation of duties
- Checks and balances
- Reviews
- Reconciliations
- Physical inventory
- Audits
- Security restrictions
- Policies
 - Cash or Inventory Policy
 - Performance guidelines

21

KEY POINTS

These are our defenses which are used to help limit or mitigate the opportunity for fraud or loss. We can add them into processes to assist in prevention or after the fact in reviews or audits as detection. Keep this list of internal controls handy. You will use this throughout the training session and when you return to your operations. These controls are not new. They are part of processes that you use in your operations every day.

Once you have a list of internal controls, you can apply them to any situation or process to mitigate risk. Understanding and applying internal controls will help you mitigate risks over any new process. Remember these controls are not unique to Gaming. They are business practices used in any business to help mitigate risks.

My Notes

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Types of Controls

Preventive	Designed to deter undesirable events from occurring .
Detective	Designed to detect and correct undesirable events which have occurred .
Directive	Designed to cause or encourage a future desirable event to occur.

22

KEY POINTS

Here are some examples of internal controls. Discussion what did everyone come up with?

- **Preventive controls** are built into, not onto, the system. **Examples:** separation of duties, passwords, authorization requirements, and physical safeguards.
- **Detective controls** are deferred to the end of the process. **Examples:** output reviews, exception reports, reconciliations, physical inventories and audits.
- **Directive Control examples:** policy statements, performance guidelines, training programs, and incentive compensation plans.
- **Mitigating controls** which are designed to compensate for missing or excessively costly controls.
- **Examples:** Supervisory review where separation of duties is impractical, and monitoring budget variances in lieu of transaction processing controls.

My Notes

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Activity – Abbreviated Poker MICS

- Use your copy of the abbreviated Poker MICS
- Working in your groups, use different colored markers to highlight the 3 different types of controls:
 - **Preventative**
 - **Directive**
 - **Detective**



23

KEY POINTS

Activity: Abbreviated Poker MICS

Group Work

TIME: 45 minutes

Supplies: (per group)

- 3 different colored highlighters
- Handout: ACTIVITY – NIGC POKER MICS

Instructions

1. Break up into small groups.
2. Select a presenter
3. Create a color key for each of the types of controls: Preventative, Directive and Detective.
4. Work together to review the NIGC Poker MICS and classify each one as Preventative, Directive or Detective.
5. Present to the class.

My Notes

TICS & SICS 2-Day Course Participant Guide

Supervision must be provided as needed...

preventive
directive
detective

Start the presentation to activate live content
If you see this message in presentation mode, install the add-in or get help at PollEv.com/app

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Poll Title: **Supervision must be provided as needed....**

- A. Preventive
- B. Directive
- C. Detective

My Notes

TICS & SICS 2-Day Course Participant Guide



A supervisor may function as a dealer with any other supervision if disputes are resolved by supervisory personnel independent of the transaction or independent of the card games department.

preventive

directive



Start the presentation to activate live content

If you see this message in presentation mode, install the add-in or get help at PollEv.com/app

Poll Title: **A supervisor may function as a dealer without any other supervision if disputes are resolved by supervisory personnel independent of the transaction or independent of the card games department.**

- A. Preventive
- B. Directive
- C. Detective

My Notes

TICS & SICS 2-Day Course Participant Guide

Documentation must be retained for at least 24 hours.

preventive

directive

detective

Start the presentation to activate live content

If you see this message in presentation mode, install the add-in or get help at PollEv.com/app

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Poll Title: **Documentation must be retained for at least 24 hours.**

- A. Preventive
- B. Directive
- C. Detective

My Notes

TICS & SICS 2-Day Course Participant Guide



What is risk?

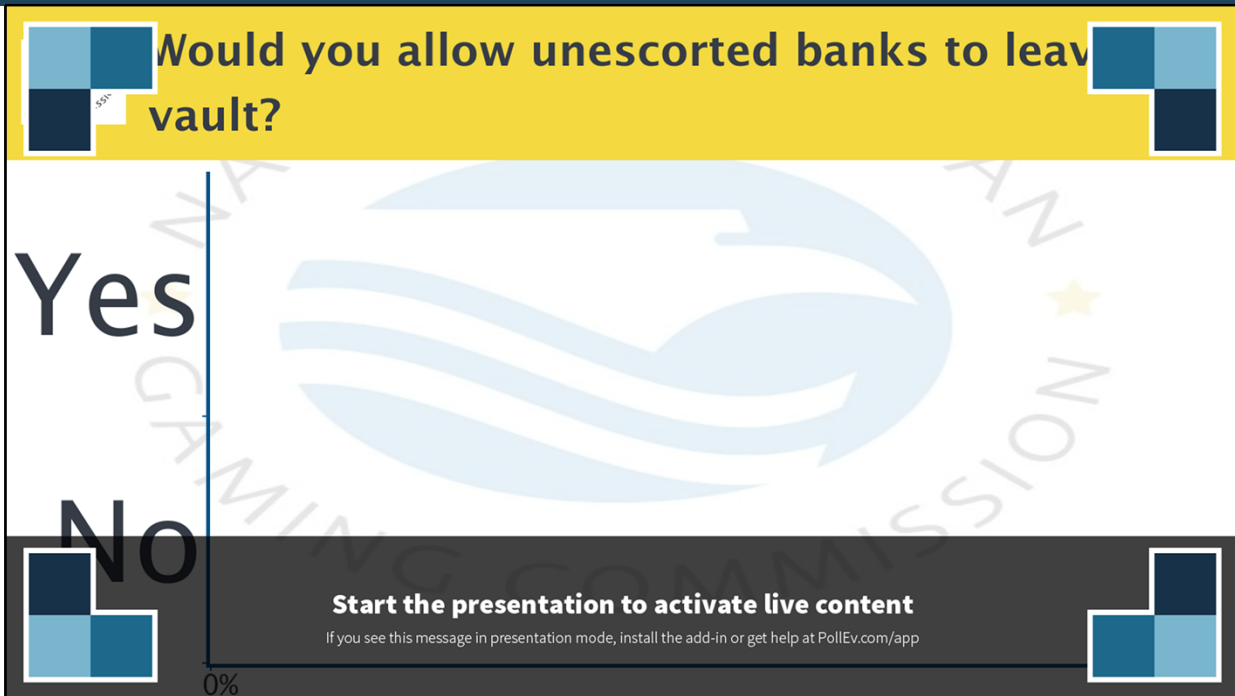
- Processes or areas that if not controlled could result in loss or abuse.
- Risk tolerance.
- Accepting risk operations vs. regulatory
 - Operations can't "accept the risk" if there is a NIGC "MINIMUM", compact or Tribal ordinance provision.



KEY POINTS

My Notes

TICS & SICS 2-Day Course Participant Guide



Poll Title: **Would you allow unescorted banks to leave the vault?**

Yes

No

My Notes

TICS & SICS 2-Day Course Participant Guide



Activity – Why Expand the NIGC MICS?

1. Work in groups
2. Select a note taker and reporter
3. RISKS page – Write down the risks associated with adopting the NIGC MICS word for word.
4. CONTROLS page – Identify the internal controls needed to address these risks
5. Share with everyone

29

KEY POINTS

Activity: Why Expand the NIGC MICS

Group Work

TIME: 45 minutes

Supplies: (per group)

- 2 Large Post It Notes labeled RISKS and CONTROLS
- Markers
- Handout: ACTIVITY – NIGC COMPLIMENTARY MICS

Instructions

1. Break up into small groups.
2. Select a recorder and presenter
3. Use the Post It Note to write down
 - The **risks** associated with adopting the NIGC MICS word for word
 - The **controls** needed to address each risk
4. Present to the class.

My Notes

TICS & SICS 2-Day Course Participant Guide

Who should add controls and adopt MICS?

NIGC
TGRA
Management

Start the presentation to activate live content
If you see this message in presentation mode, install the add-in or get help at PollEv.com/app


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Poll Title: **Who should add controls and adopt MICS?**


- A. NIGC
- B. TGRA
- C. Management


My Notes

TICS & SICS 2-Day Course Participant Guide




Who should write detailed policy and procedures into the SICS?






NIGC
TGRA



Start the presentation to activate live content
If you see this message in presentation mode, install the add-in or get help at PollEv.com/app



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Poll Title: **Who should write detailed policy and procedures into the SICS?**

- A. NIGC
- B. TGRA
- C. Management

My Notes

TICS & SICS 2-Day Course Participant Guide



Day 1 Wrap Up



32

KEY POINTS

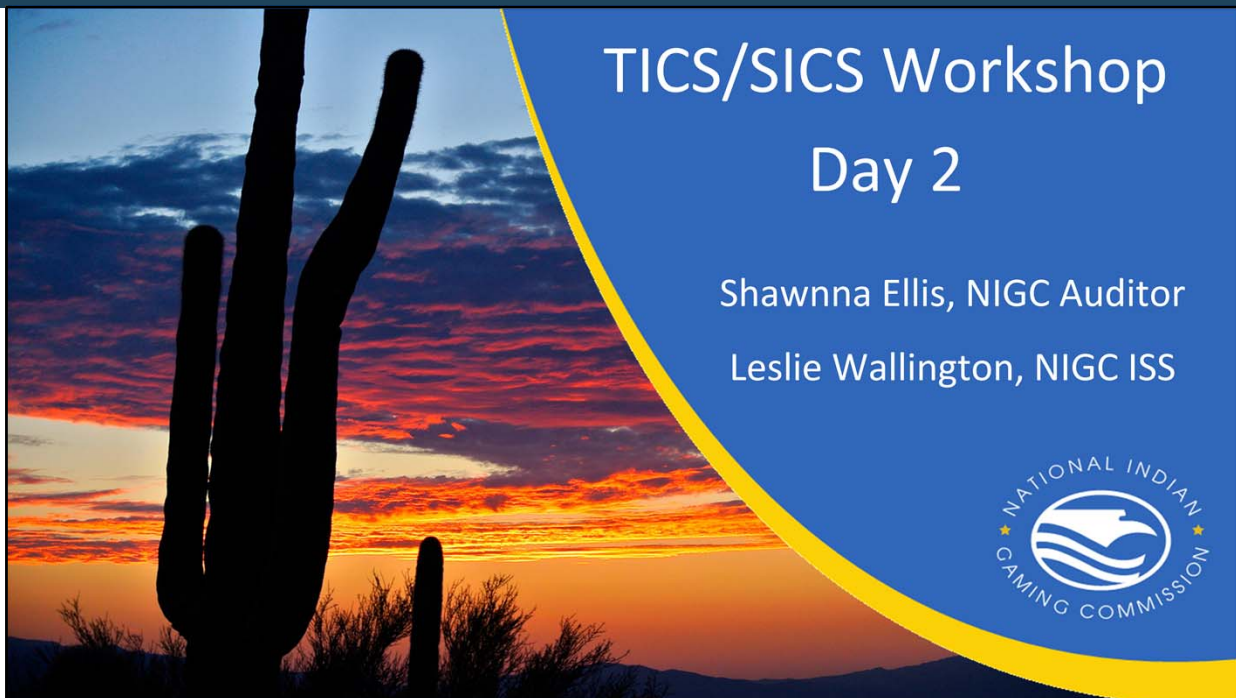
My Notes

TICS & SICS Course

Day 2



TICS & SICS 2-Day Course Participant Guide



TICS/SICS Workshop Day 2

Shawna Ellis, NIGC Auditor

Leslie Wallington, NIGC ISS



KEY POINTS

My Notes

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Main Ideas



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KEY POINTS

My Notes

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NIGC CLUE AND ANSWER

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KEY POINTS

My Notes

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Rules

- Divide into groups.
- Select a team name.
- Each slide contains a description (clues) of a specific internal control.
- Yell out your team name to provide an answer.
- Respond by saying.. What is inventory control ?

36

KEY POINTS

My Notes

TICS & SICS 2-Day Course Participant Guide



Any Questions?

Are you ready?

Lets GO!



37

KEY POINTS

My Notes



Clue 1

When the duties of a given process are assigned to at least two agents.

38

My Notes



Clue 2

When a supervisor reviews a transaction and attests to its accuracy at a specific dollar amount.

40

My Notes



Clue 3

The process of ensuring two sets of records are in agreement by comparing account balances.

42

My Notes



Clue 4

When funds are counted separately and independently by two agents.

44

My Notes



Clue 5

When an independent department accounts for all assets at periodic intervals.

46

My Notes



Clue 6

**When doors are locked and
access is granted only to
authorized individuals.**

48

My Notes



Clue 7

**Recording the
amounts counted.**

50

My Notes

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Clue 8

When more than one person counts and both sign a record indicating they agree on the amount.

52

My Notes



Clue 9

**When the purchasing agent
differs from the receiving
agent.**

54

My Notes



Clue 10

**When a bingo payout requires
a supervisor's signature
before it can be paid.**

56

My Notes



Clue 11

**When only security can
access a specific location.**

58

My Notes

TICS & SICS 2-Day Course Participant Guide



Participating with Poll Everywhere



Poll Everywhere

1



Leader asks a question

2



Participants respond

3



Responses are displayed immediately!

60

KEY POINTS

We'll continue to use Polls to get your input and participation.
Remember the polls are anonymous and your participation is voluntary.

My Notes

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Using Your Phone to Participate

1. Text **NIGC** to **22333** to join the session.
2. Then text your response to the questions that are on the slide.



KEY POINTS

We're going to have a practice poll question so you get used to using Poll Everywhere.

1. Text **NIGC** to **22333** to join the session.
2. Then text your response to the questions that are on the slide.

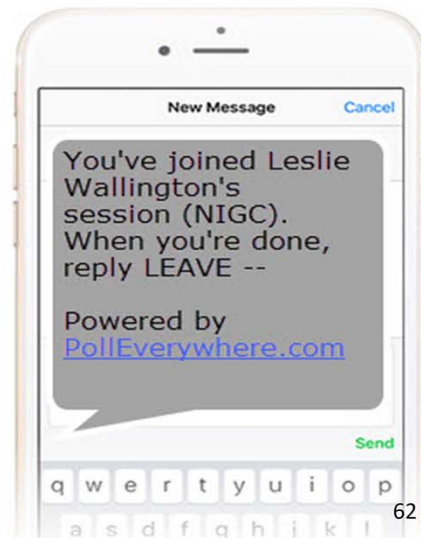
My Notes

TICS & SICS 2-Day Course Participant Guide



Using Your Phone to Participate

1. You will receive a text message confirming that you are in the polling session.
2. Do **NOT** select the PollEverywhere.com link.
3. Now you can enter your response to the poll as a text message.

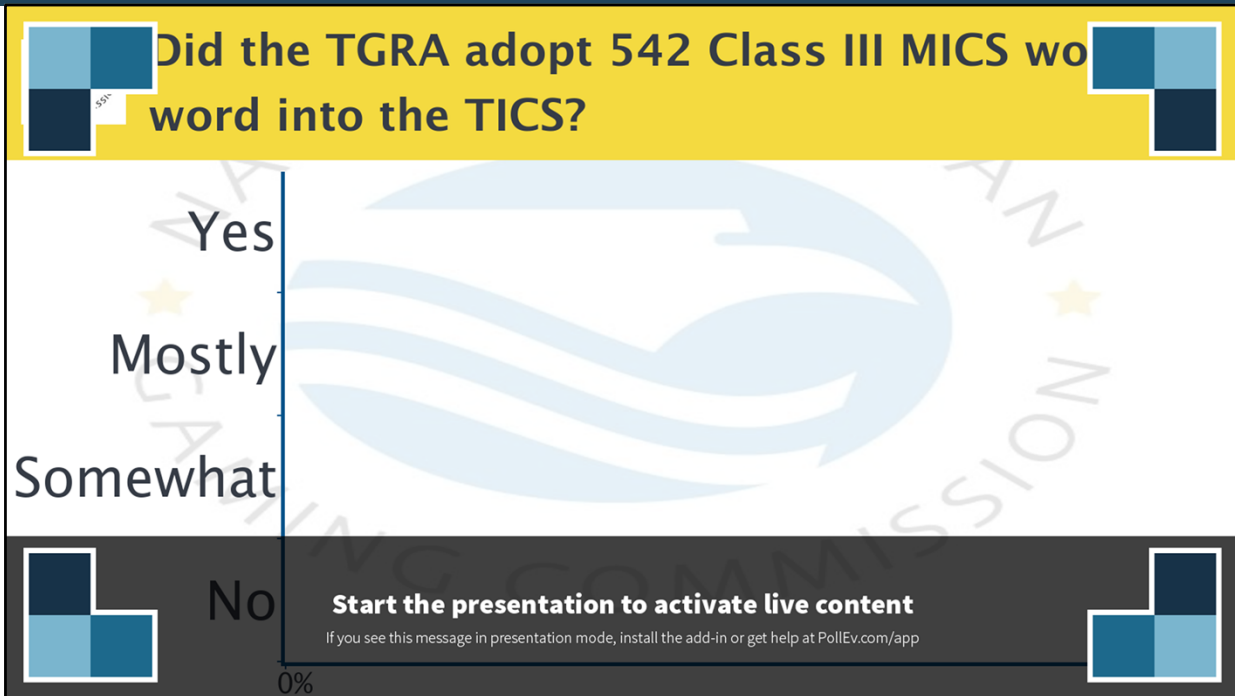


KEY POINTS

After your first text sent to 22333 you will receive a confirmation message.
Do NOT select the link included here.
Simply respond to the poll listed on the powerpoint.

My Notes

TICS & SICS 2-Day Course Participant Guide

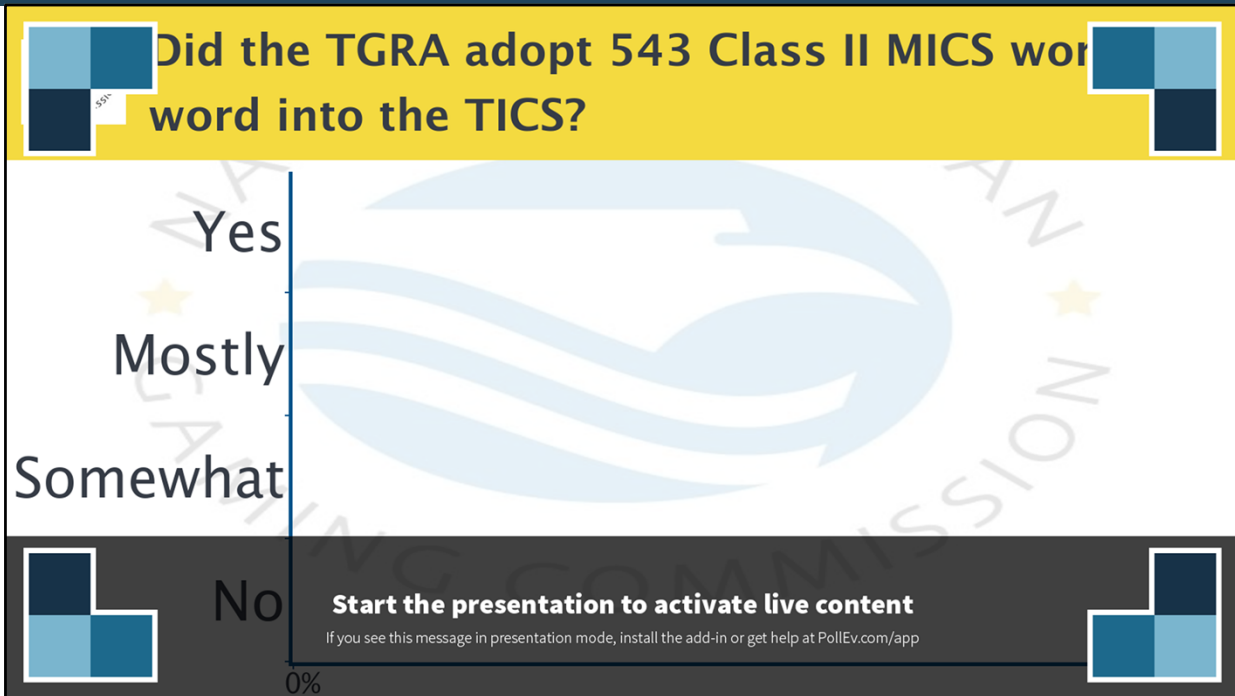


Poll Title: Did the TGRA adopt 542 Class III MICS word for word into the TICS?

- A. Yes
- B. Mostly
- C. Somewhat
- D. No

[My Notes](#)

TICS & SICS 2-Day Course Participant Guide



Poll Title: Did the TGRA adopt 543 Class II MICS word for word into the TICS?

- A. Yes
- B. Mostly
- C. Somewhat
- D. No

[My Notes](#)

TICS & SICS 2-Day Course Participant Guide



NIGC TICS/SICS Workshop

Hands on Activities

Applying what you learned

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KEY POINTS

The next activities will apply what we have discussed throughout this presentation.

We will first compare NIGC MICS 542 to 543 identify what controls need to be added to the MICS before adopting into the TICS.

We will when take the same comp MICS and write detailed procedures as if we were management.

Let's begin.

My Notes

TICS & SICS 2-Day Course Participant Guide



Activity - TICS

1. Work in groups
2. Use 543 class II checklist for comps
3. Discuss controls to be added
4. Share with everyone

66

KEY POINTS

Activity: TICS

Group Work

TIME: 1 hour

Supplies: (per group)

- Post It Note
- Handout: 543 class II checklist for comps

Instructions:

1. Working in your groups.
2. Select a new recorder and presenter
3. Discuss and write down controls that can be added and which ones can be expanded.
4. Share with the class.

My Notes

TICS & SICS 2-Day Course Participant Guide



Activity - SICS

1. Work in groups
2. Use 543 class II checklist for comps
3. Write detailed procedures to address each section of the TICS
4. Share with everyone

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KEY POINTS

Activity: TICS

Group Work

TIME: 1 hour

Supplies: (per group)

- Post It Note
- Handout: 543 class II checklist for comps

Instructions:

1. Working in your groups.
2. Select a new recorder and presenter
3. Discuss and write detailed procedures to address each section of the TICS.
4. Share with the class.

My Notes

TICS & SICS 2-Day Course Participant Guide



Main Ideas



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KEY POINTS

My Notes

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Knowledge Review

- Legibly write your name and email address
- Do your best
- We will go over the answers at the end
- Be on the lookout for the survey email 90 days from today

QUESTIONS

1- A B C D

2- A B C D

3- A B C D

4- A B C D

5- A B C D

6- A B C D

69

KEY POINTS

Now it's time to take the knowledge review.
Do your best!

My Notes

TICS & SICS 2-Day Course Participant Guide



Questions

Contact Information:

TRAINING@nigc.gov



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KEY POINTS

If you have any questions or would like information about additional topics and training please contact the NIGC training department.

My Notes

TICS & SICS 2-Day Course Participant Guide



Course Evaluation

- Provide an honest assessment of your experience
- Written suggestions and comments are greatly appreciated and allow us to improve your experience



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KEY POINTS

Our last task is to the course evaluation.

We use this information evaluate the effectiveness of the course and to make improvements so please provide specific written feedback if applicable.

My Notes

Training Course Evaluation Form

	Course	TICS and SICS 2 Day Course
	Instructor	

Instructor	Strongly Agree (5)	Agree (4)	Neutral (3)	Disagree (2)	Strongly Disagree (1)
1. The instructor was knowledgeable and well prepared.					
2. The instructor engaged participants and they responded well to questions.					

Please provide specific suggestions or recommendations for the instructor in the space below:

Course Materials	Strongly Agree (5)	Agree (4)	Neutral (3)	Disagree (2)	Strongly Disagree (1)
3. The course content, topics and activities were engaging and met my expectations.					
4. I found the information provided in the course to be valuable and I should be able to apply it to my job.					

Please provide specific suggestions or recommendations for the course content in the space below:

Course Pacing	Strongly Agree (5)	Agree (4)	Neutral (3)	Disagree (2)	Strongly Disagree (1)
5. The course was well paced and there were adequate breaks throughout.					

Please provide specific suggestions or recommendations for the course pacing in the space below:

Overall Course Rating	Excellent	Good	Fair
How would you rate this course overall?			

Overall Course Impression

Please provide any comments, suggestions or ideas to help improve this training course.

TICS & SICS Course Handouts





ACTIVITY–ABBREVIATED POKER MICS

Supplies

- 3 different colored highlighters
- Handout: NIGC POKER MICS

Instructions

1. Break up into small groups.
2. Select a presenter.
3. Create a color key for each of the types of controls: Preventative, Directive, and Detective.
4. Work together to review the NIGC Poker MICS and classify each one as Preventative, Directive or Detective.
5. Present to the class.



ACTIVITY– Why Expand the NIGC MICS?

Supplies

- 2 Large Post It Notes labeled RISKS and CONTROLS
- Markers
- Handout: ACTIVITY – NIGC COMPLIMENTARY MICS

Instructions

1. Break up into small groups.
2. Select a recorder and presenter.
3. Use the Post It Note to write down:
 - The **risks** associated with adopting the NIGC MICS word for word
 - The **controls** needed to address each risk
4. Present to the class.

§543.13 NIGC MICS- Complimentary services or items

(b) Complimentary services or items. Controls must be established and procedures implemented for complimentary services or items that address the following:

(c) Complimentary services and items records must be summarized and reviewed for proper authorization and compliance with established authorization thresholds.



ACTIVITY–TICS

Supplies

- Post It Note
- Handout: MICS CLASS II - AUDIT CHECKLIST COMPLIMENTARY SERVICES OR ITEMS (CS)

Instructions

1. Working in your groups.
2. Select a new recorder and presenter.
3. Discuss and write down controls that can be added and which ones can be expanded.
4. Share with the class.



ACTIVITY–SICS

Supplies

- Post It Note
- Handout: MICS CLASS II - AUDIT CHECKLIST COMPLIMENTARY SERVICES OR ITEMS (CS)

Instructions

1. Working in your groups.
2. Select a new recorder and presenter.
3. Discuss and write detailed procedures to address each section of the TICS.
4. Share with the class.

