



November 6, 2025

Via Email

Warren Oliver
TGA Executive Director
Muckleshoot Tribal Gaming Agency
2700 Auburn Way South
Auburn, WA 98002
Warren.oliver@mtga.us

Re: Request for alternate standard to 25 C.F.R. § 543.17(j)(2)(i)

Dear Mr. Oliver:

I am writing with respect to your request on behalf of the Muckleshoot Tribal Gaming Agency (TGA) received by the National Indian Gaming Commission (NIGC) on September 4, 2025, for the NIGC Chair to review and approve an alternate standard to 25 C.F.R. § 543.17(j)(2)(i). The complete alternate standard submission was received by the NIGC on September 15, 2025. Pursuant to 25 C.F.R. § 543.5(b)(1), the NIGC Chair may approve or object to an alternate standard approved by a tribal gaming regulatory authority.

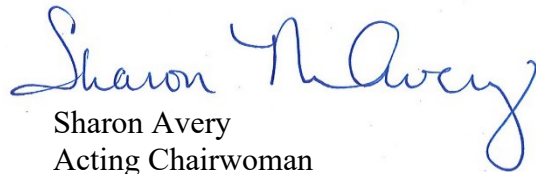
Thank you for providing the 25 C.F.R. § 543.17(j)(2)(i) TGA alternate standard, approved by the Muckleshoot Gaming Commission on July 29, 2025, for my review. In addition to the alternate standard, your submission explained how the alternate standard achieves a level of security and integrity sufficient to accomplish the purpose of the standard it is replacing, as required by 25 C.F.R. § 543.5(a)(2)(i).

Part of the process of reviewing a proposed alternate standard includes determining whether the proposed alternate standard will affect the compliance or operation of other minimum control standards. As a result of this review, it is my recommendation that the TGA also implement a process to ensure that when an independent agent is utilized in lieu of a drop/count team member, the independent agent should not be the key custodian issuing

or receiving the keys.¹ Additionally, the independent agent should be independent of the department being dropped.²

The attached alternate standard to 25 C.F.R. § 543.17(j)(2)(i) is hereby approved as the alternate standard achieves a level of security and integrity sufficient to accomplish the purpose of the standard it is to replace, and the alternate standard may continue to be used as authorized by the TGA. If you have any questions concerning this letter, please contact Staff Attorney Danielle Wu at danielle.wu@nigc.gov.

Sincerely,


Sharon Avery
Acting Chairwoman

Cc: George Lewis, Director of Operations, TGA (George.Lewis@muckleshoot-tga.org)

¹ 25 C.F.R. § 543.17(j)(4).

² 25 C.F.R. § 543.17(c)(5).



MUCKLESHOOT GAMING COMMISSION

Muckleshoot Tribal Gaming Agency
2700 Auburn Way South • Auburn, Washington 98002
Phone: 253.218.0600 • FAX: 1.833.258.9493



September 4, 2025

Sharon Avery
Acting Chairwoman
National Indian Gaming Commission
Alternate_standards@nigc.gov

Re: Request for alternate standard to 25 CFR 543.17(j)(2)(i)

Chairperson:

We respectfully request your consideration of the proposed alternate standard to the Minimum Internal Controls (MICS), 25 CFR 543.17(j)(2)(i).

From:

For Tier A and B operations, at least two (2) drop team agents are required to be present to access and return keys. For Tier C operations, at least three (3) drop team agents are required to be present to access and return keys.

To:

*For Tier A and B operations, at least two (2) drop team agents are required to be present to access and return keys. For Tier C operations, at least three (3) drop team agents, **or two (2) drop team agents and one (1) additional independent agent**, are required to be present to access and return keys.*

The Muckleshoot Tribal Gaming Agency (TGA) certifies that this alternate standard has been reviewed and approved by the Muckleshoot Gaming Commission and is ready for implementation upon NIGC approval.

Muckleshoot TGA is confident that the alternate standard offers the same protection as the current standard while also allowing flexibility for gaming operations. The new standard still requires three-person integrity and utilizes an independent department which we believe is stronger than three persons from only one department.

We appreciate your consideration of this request. Please contact me at the email or phone below or our Director of Operations, George Lewis, George.Lewis@mtga.us, if additional information is required.

Sincerely,

Warren Oliver
Executive Director
Muckleshoot Tribal Gaming Agency
E: Warren.oliver@mtga.us
P: 253-218-0600 x4427