

NATIONAL INDIAN GAMING COMMISSION
REGIONAL TRIBAL CONSULTATION

Reporter's Transcript of Proceedings held
at the Seminole Hard Rock, 1 Seminole Way,
Hollywood, Florida, Commencing at 9:21 a.m., on
Tuesday, February 3, 2011 Before Randi J.
Garcia, RPR.

Job No. NJ303781

1 CHAIRWOMAN TRACIE STEVENS: Good morning.
2 To begin, I would like to turn the meeting over
3 to Chairman Mitchell Cypress of the Seminole
4 Tribe for opening and invocation.

5 CHAIRMAN MITCHELL CYPRESS: Thank you.

6 Good morning, everybody. I welcome
7 everyone here, all the tribal leaders and their
8 staff. And I know that everyone is happy to be
9 here because we see on the news it's white
10 everywhere. You pass, I guess, Central Florida
11 and it gets cooler, but the weather changes
12 from there on out. I understand there is some
13 other places where the roof caved in like the
14 Tulsa Hard Rock. It slows you down on your
15 game. And we will probably need a lot of
16 prayer for that, for them to arrive through the
17 snow area.

18 But down here snow never hit the ground
19 and the frost is the one that killed us out
20 here.

21 I want to go ahead and start introducing
22 the staff here. First of all, I would like to
23 go ahead and introduce Mr. Jim Shore, his
24 assistant Agnes, members of staff, Marty, Alan
25 Huff, Senior. And we have Ross, the staff

1 attorneys and Joe Webster, Ed Jenkins and Mike
2 Tiger, our treasurer. I just see a McDonald's
3 sign there. Also, over here we have Suresh
4 from accounting, and Jim Raker, and one of our
5 accountants, Marsha Green.

6 I think we have a very fine staff that has
7 been pushing us all the way up today and make
8 sure we have some others that we will be
9 discussing that we need to share, the
10 information you all share with us.

11 I am going to introduce one of our tribal
12 member counsel, Mr. Max Osceola.

13 MAX OSCEOLA: I will stand so you can see
14 me. Welcome to paradise. Like they say on
15 American Idol, "Welcome to Hollywood."

16 I want to give you a little history with a
17 perspective of where you're at. In December of
18 1977 we started bingo, high-stakes bingo right
19 across the street. You call it the classic.
20 That is when Indian gaming started here.

21 The sheriff of Broward County was going to
22 come on the reservation and force state
23 regulation and we said "no, you are not." We
24 got an injunction. We wanted the lower levels.
25 Supreme Court said they're not going to hear

1 it. That's right. If it's legal in the State
2 of Florida, it is legal on the Indian
3 reservation and it's a sovereign nation, we can
4 regulate that activity. It was called
5 Butterworth versus Seminole Tribe, who was the
6 sheriff of Broward County. They said "what is
7 butter worth? "About nickel a pound."

8 So we have progressed from '77 to where, I
9 guess, we were under BIA. They didn't know
10 want to do with gaming. They said how do we
11 regulate this, states and congress, when they
12 said how do we get our cut? When the natives
13 were making the money selling trinkets, they
14 didn't care. When we got into big business,
15 then they wanted their cut. So they passed the
16 National Gaming Act.

17 One time we were in Washington D.C. and I
18 was talking to our senator, Senator Graham. I
19 said "Senator Graham, there is a National
20 Indian Gaming Act." I said "is there a
21 national non-Indian Gaming Act?" He kind of --
22 well, states regulate that activity. I said
23 "BC, before Columbus, native tribes were here.
24 We can regulate our own activity."

25 So I am happy to welcome you here. I am

1 glad to see the staff from DC. I am glad to
2 see you're a native too. Because in your heart
3 you know where you're at. You may be working
4 for the government, but you were born native.
5 Welcome to Seminole Country.

6 Thank you.

7 CHAIRWOMAN TRACIE STEVENS: Thank you,
8 Chairman Cypress. My name is Tracy Stevens. I
9 am a member of Tulalip Tribes from Washington
10 State. I am the chairwoman of the National
11 Gaming Commission. I want to extend my thanks
12 and gratitude to the Seminole Tribe for
13 allowing us to come into your territory and be
14 such gracious hosts. This is a wonderful
15 facility here. It's a great example of what
16 tribes can do when they govern themselves. And
17 it is a beautiful facility. We are really glad
18 that we are here today.

19 I do want to recognize we have former
20 commissioners that are here, Joel Frank, the
21 former national gaming commissioner, and also
22 Teri Poust. I think Liz is here. Liz is in
23 the other room. And also I want to recognize
24 our staff that is here. We have outside Rita
25 Homa. She is the executive secretary of the

1 commission, and works really, really hard. If
2 she doesn't speak a lot today, she has
3 laryngitis. We appreciate all the work she has
4 done to help us get here. We also have Mavis
5 Harris here. She is right back here. She was
6 handing out packets earlier. She's from our DC
7 office. We have Cindy Altimus. She is over
8 here with the transcriptionist. She's the
9 regional director of the Eastern Region, Keith
10 Hicks works in enforcement. Many of you may
11 know him. Also, we have Larry Roberts, who is
12 our new general counsel right over here, Paxton
13 Myers, who is our chief of staff, and next to
14 me is Lael Echo-Hawk, and last but not least
15 Associate Commissioner Dan Little.

16 I want to say thanks to all the staff. We
17 could not have -- this is our eighth stop. We
18 could not have done this without the support of
19 our staff. And where I come from you support
20 the people that help you do your work. So I
21 want to extend thanks to them.

22 I appreciate everyone coming out. This is
23 the last stop on our eighth-stop tour on our
24 Notice of Inquiry and regulatory review
25 discussions. And I realize that many of you

1 had to arrange your -- rearrange your travel so
2 you could miss that storm or had to wait out
3 the storm. There are many people who were not
4 able to make it today because of the weather.
5 So we appreciate everyone who is here today.
6 Like I said, this is the last stop on this
7 particular consultation tour.

8 There will be more. That is something
9 that they have been trying to make sure we say.
10 This is just the beginning. This is not a
11 one-shot deal. We will be having more of these
12 discussions as we -- while we are in office.

13 Many of you may have heard me in separate
14 discussions or in conferences over the past six
15 months since I have been in office. I have
16 been in office since the beginning of July.
17 This commission has come together to identify
18 areas we believe need attention. They have
19 come -- we have come down to basically four
20 major initiatives.

21 The first one is consultation relationship
22 building. Today is a demonstration of the
23 changes that we have made to how we consult
24 with tribes. This is a new day for the NIGC.
25 We will be having these -- when we are talking

1 about broad policy, like regulations that
2 affect tribes all across the country, we will
3 having this open forum dialogue, you know.
4 This is being recorded, so there is a record
5 for those tribes who could not make it and can
6 see what -- they can read for themselves what
7 was discussed. We can have an open dialogue.
8 We can exchange ideas. We can hear your
9 thoughts and your suggestions, and especially
10 for this subject today, your priorities, which
11 regulations we should take a look at first.

12 Now, we certainly don't -- we know this is
13 a change from the way meetings have been done
14 before there -- the practice before was you
15 would get a letter, sign up for a time, and you
16 get 15 to 45 minutes, sort of an assembly line
17 fashion to talk about a universe of things,
18 policy, your individual issues. We still have
19 individual meetings with tribes while we are
20 travelling. If you ever come to DC or we are
21 out in your area, if we are at a conference we
22 our avail ourselves to make sure that we are
23 available to the tribes to address those
24 individual concerns. We don't expect your
25 individual issues to be aired here today. We

1 have side meetings, meetings outside of this
2 consultation, to discuss those matters. But I
3 want to let everyone know if you have
4 individual issues, don't feel like that this is
5 your only chance to talk to us about that.

6 Today's discussion is about the Notice of
7 Inquiry. We will talk more about that in a
8 moment. But this is the beginning of us
9 working together, identifying the areas that we
10 need to pay attention to, identifying issues,
11 and also solving the issues, solving any
12 problems we have. What we are learning over
13 these eight consultations is that there are
14 differences between tribes. There are
15 different priorities, which is expected because
16 tribes are just different. They are different
17 culturally, different traditionally. Their
18 gaming is different. Their demographics are
19 different. Their operations are different.
20 And what we are hearing is that tribes like to
21 be able to sit in this format and say "I didn't
22 know that that was an issue for tribe X, or I
23 have a similar issue at my tribe."

24 Moreover, we have the opportunity to solve
25 it together. We can do this together. And

1 this is the beginning of building an agenda and
2 then going to work together. So that is our
3 first initiative.

4 Our second initiative is technical
5 assistance and training. It is required by the
6 statute, but we think it should be more than
7 just a statutory requirement that we have to
8 meet. We should be helping tribes protect
9 their operations. You know, we should be a
10 partner with you. And if we are providing
11 training that doesn't help your situation, then
12 we are not doing our jobs.

13 We are in a process of relying on our
14 program, our technical assistant and training,
15 so that we hit our target, we hit the target
16 that you tell us needs to be hit for your
17 facility or for your operations.

18 We recently put out a survey to tribes on
19 internets, on web sites, by mail, fax, snail
20 mail, e-mail. We have a number of responses.
21 The survey was basically asking what kind of
22 training do you need? Is there training that
23 we are not offering? Do we need different
24 levels of training?

25 So it's a very simple survey that we have

1 gotten quite a bit of response back. And what
2 we are going to do with that is take a look at
3 our training catalog and make sure that we are
4 providing the training that tribes need.

5 I think that survey closed yesterday, but
6 I am sure we are getting more and more. We
7 will consider them as they trickle in, so that
8 we can really examine this program and make
9 sure that it is a streamline process, and it is
10 doing what it is intended to do, bring out and
11 prevent problems, help tribes stay in
12 compliance and safeguard the operations that
13 you all regulate on a day-to-day basis.

14 The third thing that we are doing is
15 agency operation review. This is actually
16 taking a lot more of our time than I had
17 anticipated. And what that means basically is
18 we should be just as concerned about how we run
19 our operations. Our agency is we are about how
20 you run your operations. What is good for the
21 goose is good for the gander. We are spending
22 a lot of time, that is, you know -- along with
23 what Paxton is doing. He's chief of staff.
24 And this is something that Associate
25 Commissioner Dan Little is taking up as one of

1 his initiatives, to make sure that we are
2 accounting, that we are transparent, and that
3 our operations are efficient, they're running
4 in the best way possible, so that we are
5 providing the services that tribes need.

6 So that is actually turning out to be
7 quite a monumental task. I thought the reg
8 review was going to be a big task. It turns
9 out that agency operation review is the one
10 that is really taking a lot of our time and our
11 attention. And it should, you know.

12 How we run internally will reflect on what
13 we provide to you externally. And, you know,
14 we are committed to making sure that we are
15 running a streamline agency.

16 Lastly, regulatory review, which is the
17 topic of today's consultation. Many of you
18 know we released a Notice of Inquiry which Lael
19 will talk about briefly after we are done
20 speaking, to ask tribes what regulations, which
21 regulations and how should we go about
22 addressing regulatory review.

23 Every administration comes in and they
24 have a prerogative to say, "okay, where are we
25 at?" Look to the past and say, okay, which

1 regulations were put in place, and are they
2 relevant still? That is what we are doing.

3 Because we are in such a short time
4 frame -- I have been in office for six months.
5 It is a three-year term. I have two and a half
6 years left. And as the staff is learning, I am
7 pushing everyone to go, go, go, go. Because I
8 have minutes. I don't have two and a half
9 years. I have minutes to try to do as much as
10 I can to provide a better agency to all of the
11 tribes. That means in terms of regulations.

12 We are asking -- we are involving tribes
13 so that we work on the things that need to be
14 worked on, and we don't get caught up in things
15 that may not be necessarily a priority or that
16 we work on multiple things and not have one
17 issue, one regulation stop us from addressing
18 others that need attention as well.

19 So Lael will talk more about that in a
20 minute. I will say some of this is going to be
21 a challenge. There will be points in time
22 where we are not going to agree. But we will
23 be very clear about why we disagree or why we
24 made the decision. And we will share that with
25 everyone.

1 I do want to turn it over at this point.
2 Those are our four major priorities. Today we
3 are kind of hitting on two. This is a new
4 consultation format. At the beginning we are
5 at the cusp of regulatory review. This is just
6 an agenda building activity for tribes to have
7 the opportunity to weigh in and say, okay, this
8 is what needs to be addressed first. This is
9 how we think it should go.

10 So four things we are working on:
11 Consultation, technical assistance, agency
12 operations review and regulatory review. You
13 will keep hearing me talk about that, because
14 that is how I am going to keep you informed on
15 what we say that we are going to do. You will
16 keep hearing us talk about those four things,
17 so you always know where we are at, and we are
18 keeping up with what we said we would do.

19 So at this time I want to hand it over to
20 Associate Commissioner Dan Little for some
21 comments, and then we will turn it over to
22 Lael. Most of today will be opening notes, the
23 microphone and the record for your concerns.
24 But I do want to give Associate Commissioner
25 Little some time to chat.

1 COMMISSIONER DANIEL LITTLE: Good morning.
2 Thank you. I want to welcome all the tribal
3 leaders and all the tribal elders and thank the
4 Seminole Tribe and Chairman Cypress for the
5 very warm hospitality. We left Rapid City
6 yesterday morning and it was 18 below. So I am
7 happy to be here.

8 Just a couple of quick things. Like the
9 chairwoman said, this session is for us to hear
10 from the tribes, the issues that you're having.
11 It's very important that we, as a commissioner
12 here, you know, gets the feedback before we
13 make decisions. And as Lael goes through the
14 NOI there is a number of specific issues and
15 questions. Please just keep in mind these are
16 only suggestions. These are not any positions
17 that the commission has taken. It is about the
18 process where these point of discussions were
19 brought up was through discussions with tribal
20 leaders, with tribal commissioners, with our
21 staff over the years folks have come up with
22 these group of issues that could need
23 reviewing. That is how they are. They are
24 just suggestions. We are just really looking
25 forward to hearing what you think about them.

1 Once again, welcome, and I look forward to
2 hearing from you all. Thank you.

3 CHAIRWOMAN TRACIE STEVENS: Thanks. It
4 does seem like we are doing a lot of the
5 talking upfront, but, really, what we want to
6 do is let you know what we are up to and
7 briefly review the Notice of Inquiry that was
8 published in the federal register in November.

9 Lael Echo-Hawk is heading up this
10 particular initiative. She sat on the other
11 side of the table, as all of us did. We come
12 from the tribal side, and she has a lot of
13 experience with codes and regulations, and she
14 has been tasked with this particular monumental
15 task. She is doing a good job managing
16 process. If we don't get the process right,
17 then we lose the substance.

18 So I will turn it over to Lael to briefly
19 do PowerPoint, go over what the Notice of
20 Inquiry says. Then we will open the floor.
21 Many tribal leaders come to these and they have
22 prepared statements. First of all, you all
23 have busy schedules, much busier than ours will
24 ever be. We recognize your time is limited.
25 We know that many of you come with prepared

1 statements. We don't want to get stuck on one
2 particular area. So we are just going to open
3 the floor after we review the Notice of
4 Inquiry.

5 Again, thank you. And I really look
6 forward to working with the tribes together
7 over the next two years. So I will turn it
8 over to Lael.

9 LAEL ECHO-HAWK: Good morning. My name is
10 Lael Echo-Hawk. I am a member of the Pawnee
11 Nation of Oklahoma. Counsel and Chairwoman
12 Stevens, and I also would like to thank the
13 Seminole Nation for allowing us to be here
14 today. Like chairwoman said, it's much warmer.
15 It's like 120-degree difference with a negative
16 40 below, with the wind chill when we were in
17 Rapid City. This is much, much nicer.

18 I will briefly go over what the Notice of
19 Inquiry is about, what the regulatory review
20 process is going to be for the NIGC, obviously
21 my contact information on the PowerPoint
22 screen. You should all have a copy of the
23 PowerPoint in your packet. If you didn't
24 receive a packet, please raise your hand and we
25 will have Mavis get some out to everyone so you

1 can follow along. There are a couple of -- I
2 see two over here. This can help you kind of
3 follow along.

4 That is my contact information. Any
5 issues or concerns you have regarding the
6 regulatory review process on the agenda you can
7 reach me at this phone number, this e-mail
8 address, talk to me today. But we do want to
9 hear from you. That is really what the intent
10 of this Notice of Inquiry and this whole
11 process is about.

12 So why regulatory review? As you guys all
13 know, probably better than I do, the Indian
14 Regulatory Act tasked the National Gaming
15 Commission with putting together regulations to
16 implement that. And so, you know, we do have a
17 regulatory framework, but it is something that
18 when this commission came on they agreed that
19 it was something that we needed to review, take
20 a look at, see how we can improve the industry.

21 Additionally, as most of you all likely
22 know, President Obama issued a directive within
23 the past two weeks telling agencies to take
24 another look at their regulatory structure, to
25 streamline it, streamline it, make it more

1 efficient, update regulations. And so we kind
2 of got up -- we are patting ourselves on the
3 back, this is our idea. But, you know, that is
4 what we are doing.

5 Additionally, we are required by the
6 executive order and the Regulatory Flexibility
7 Act to put together a semiannual regulatory
8 review agenda. So that is something that will
9 come out in April, and this whole process will
10 lead to that agenda.

11 The Commission has also taken the
12 executive order. We are all very familiar with
13 it 13175, the consultation and coordination
14 with Indian Tribal Government executive order.
15 We take that very seriously. We are committed
16 to the intent of that order. It is now on our
17 web site. There is actually a button -- this
18 is due in large part to Mavis right here, part
19 of our web site staff, Mavis and Mark. We have
20 a great staff who has been really great about
21 updating our web site. We do have a new web
22 page that is dedicated to tribal consultation.
23 The executive order is on that web site. You
24 click it, there is another button that will
25 lead you to the regulatory review web page as

1 well where all this information can be found.

2 But this commission is committed to the
3 intent of that executive order. A particular
4 section of the commission that it's really
5 paying close attention to is section 3C3. It
6 says "when undertaking to formulate and
7 implement policies that have tribal
8 implications, agency shall -- shall in
9 determining whether to establish federal
10 standards consult with tribal officials as to
11 the need to those standards."

12 That is what we are doing today. That is
13 what we have been doing for the past month.
14 Before we start working on standards, we want
15 to talk to you, we want to understand what the
16 needs truly are and how we can best go about
17 making those changes that need to happen in
18 regulations.

19 So what is a Notice of Inquiry? A Notice
20 of Inquiry is something I haven't seen used
21 with agencies when interacting with tribal
22 governments. However, it is a tool that is
23 used by a number of federal agencies when
24 communicating with their constituents. So a
25 Notice of Inquiry is questions. We hear that

1 there is an issue regarding certain policies.
2 Please tell us, you know, you people that are
3 going to be the most affected by the changes or
4 this policy, tell us what the issues are and
5 how we can best work to address those issues.
6 That is what this Notice of Inquiry is.

7 I will ask three primary questions. What
8 regulations do we need to be looking at? When,
9 sort of and what priority level. As the
10 chairwoman mentioned, we are operating on a
11 very short time frame. By best guess for how
12 long we can continue ruling before the
13 presidential election process really gets
14 going, and they tell federal agencies to stop
15 issuing rules is probably about 18 months.

16 So 18 months to consult, to do revisions,
17 to put the notice in the federal register is
18 really not a long time. We have pretty -- it
19 looks like we are going to have a lot on our
20 plate. We will really need your assistance.
21 We need to know the priorities. What are the
22 most important things that need to be
23 addressed? Then, finally, how? The how leads
24 to tribal advisory committees, do we do this
25 through negotiated rule making. Are there some

1 instances where a notice of written -- written
2 notice of proposal we are making and then just
3 asking for written comments, if that is
4 sufficient. We need to know. We really need
5 input from tribal leaders and your staff on how
6 we should go about doing this. In the best
7 way, that brings in the best comments from the
8 industry, from the Indian Country, from the
9 gaming operations, the tribal leadership.

10 So this is our road show. I keep hearing
11 that we are going to get T-shirts made, but I
12 haven't seen them yet. But this is where we
13 have been. Since January 11 we have been in
14 eight locations holding eight consultations.
15 This is our last stop, obviously, but the idea
16 was that we bring the agency to you that tribes
17 should not have to travel to DC to talk to us.
18 We need to be in Indian Country. So you guys
19 can continue doing what is very important in
20 your communities and you don't have to go all
21 the way to DC.

22 So the Notice of Inquiry published
23 November 18th. If you're at G2E or at NCAI you
24 might have heard the chairwoman make the
25 announcement. The commentary closes

1 February 12th. That is in a week from now. We
2 are going to give everyone here the opportunity
3 to kind of think about what you heard today and
4 look at what is on the web site and make your
5 comments. All written comments and
6 consultation transcripts are going to be posted
7 on the tribal consultation page of the web
8 site. There are already probably 12 comments
9 up. There is at least one transcript. I am
10 hoping to get a couple more up by the end of
11 this week. Again, thanks to Mavis and the
12 staff that we have in DC. But we are really
13 committed to transparency and accountability.
14 And one way to do that is put all the
15 information that we have out and make it
16 accessible to you, so you know what we have
17 heard from other tribes. You can take a look
18 and see what other tribes are saying and make
19 comments based on that as well.

20 So, again, what Commissioner Little said
21 we want to emphasize, these are suggestions
22 only. We are not committed to anything that
23 was -- that we put into the Notice of Inquiry
24 or federal register. These are just issues
25 that have been raised as we have done

1 consultations over the summer, as we have had
2 meetings with tribes and as we met with people
3 at conferences. We haven't taken a position on
4 what is included in the notice.

5 So very, very briefly, what regulations
6 were included in the Notice of Inquiry? What
7 were the issues we heard? We heard some
8 concerns about revenue, the definitions that
9 are in the regulations today. Also, we've
10 heard some concerns about the bulletin that is
11 out there and the use of net gaming revenues
12 and whether that should be revisited as well.

13 Management contracts and a number of
14 issues that come up with management contracts
15 that we have been asked to take a look at.
16 Some very simple things, like changing the
17 calculation of fees from calendar year to a
18 tribe's fiscal year.

19 We've heard from our finance department
20 that makes more sense and makes the calculation
21 easier and simplifies the process. Using
22 industry standards, definitions. One thing we
23 heard about and we haven't heard anyone say
24 that it has not been a good idea, that is to
25 put together some sort of ticketing type system

1 for when tribes submit their fees late, instead
2 of issuing notice of violation.

3 As you all know, and you know, I
4 represented a tribe for six and a half years,
5 notice of violations are significant. They're
6 not insignificant. They're very important,
7 both internally for the tribe and for the
8 people looking at the tribe. We don't want to
9 issue a notice of violation for something that
10 could have been an oversight in personnel
11 changes. We heard -- was it maybe in Rapid
12 City -- that someone, their CFO was going in
13 for like a lung transplant, so the fees were
14 submitted three days late and they get a notice
15 of violation. It took them a substantial
16 amount of time to resolve that issue. But they
17 still -- even though they settled, they still
18 have a notice of violation. And whether or not
19 that is a -- that is the right way to go about
20 dealing with late fees submissions.

21 The self-regulation -- regulation, whether
22 or not the burden for obtaining that
23 certificate, really -- there is really the
24 benefit, if the benefit really outweighs the
25 burden. We heard that it's not a successful

1 regulation, that we need to take a look at it.

2 Management contracts, there is a number of
3 issues on management contracts, that if you
4 have some of those, if you heard about those,
5 we do want to hear what your thoughts are on
6 these issues.

7 Proceeding before the commission. I am an
8 attorney. I like to know what the process is.
9 I don't want to file an appeal and have it sit
10 there until I am about ready to retire and then
11 all of a sudden it is going to be addressed.
12 We've heard that this is something that should
13 give -- we should provide them notice. People
14 should know what their due process is when they
15 come before the commission and they're filing a
16 notice of appeal or, et cetera. So that is
17 something else that people have said that we
18 should consider working on.

19 The issue with the most press, the issue
20 that the chairman woman said, it just sucks the
21 air out of the room, and that is the MICS.
22 Sucks the air out of this room and it's over in
23 the next room right now. But this is obviously
24 a very important issue in Indian Country. It
25 is something we heard about in every single

1 meeting, different opinions on how to deal with
2 these issues.

3 My concern is from a process standpoint is
4 how do we address the MICS, Class II, Class
5 III, technical standards? How do we address
6 the issue that the Colorado River Indian Tribe
7 told me that they didn't give the agency the
8 authority to promulgate or enforce Class III
9 MICS? How do we deal with that, given that we
10 have Class III MICS regulations today? What do
11 we do about that? What do we do about that in
12 the context of tribes that have included that
13 in the NIGC Class III MICS in their compact and
14 then given the NIGC authority to enforce the
15 ordinance.

16 So we have a number of issues around Class
17 III MICS specifically, and very different
18 opinions. We do need some help figuring out
19 how to address those.

20 But, you know, back to process, from my
21 perspective, how do we also do this in a way
22 that doesn't sort of obliterate all these other
23 concerns and all the other issues that are as
24 important to Indian Country and need to be
25 addressed in the regulations. How do we do

1 both things and make sure that we do the most?
2 We need your help on that.

3 The pilot program for background
4 investigations for licensing --

5 MS. ALTIMUS: Can you slow down, please.

6 LAEL ECHO-HAWK: I have to slow down and
7 speak slower.

8 The pilot program for background
9 investigations, it has been in place for a
10 number of years, and should we consider
11 formalizing that in a regulation. We had a
12 number of tribes ask us to allow access to
13 finger printing, the finger printing process
14 and the database that we use with the FBI for
15 non-primary management officials or key
16 employees.

17 If we were to do this it requires a change
18 to our MOA with the FBI, but if it is something
19 the tribes are interested in, then it is
20 something we can look at, but we need some
21 input.

22 The facility licensing regulation, we've
23 heard over and over and over again that this
24 regulation should be opened back up for
25 comment, that we need to take another look at

1 it. There have been some concerns that this
2 regulation was put into place without proper
3 consultation, that the agency fell down in the
4 process of putting that regulation together,
5 and that we need to go back and take another
6 look at it.

7 Access and -- inspection and access to
8 records held off site. For example, a former
9 management company may have some financial
10 records that they have at their facility in
11 Vegas, and the tribe cannot get access to them.
12 Should we specify a regulation that the NIGC
13 has the authority to access those regulations
14 or access those records at those sites.

15 Another issue that has been raised is
16 whether or not the chairwoman or the chair of
17 NIGC should have the authority to withdraw a
18 notice of violation. And along those lines, we
19 heard that perhaps we need to go back and take
20 another look at the enforcement regulations
21 themselves and put into regulation form a
22 pre-notice of violation with an opportunity to
23 comply and cure so that we don't end up just
24 issuing a notice of violation. As I said
25 before, they are very important. They are

1 substantial -- they have a substantial impact.
2 And we need to be cognizant of that. If we can
3 work with the tribe to come into compliance,
4 perhaps we can avoid it and it will be all
5 together. So we heard a number of
6 consultations that that is something the NIGC
7 should consider doing. Other federal agencies
8 should have similar regulation. Perhaps we
9 need to look at those types of models.

10 So those are the issues that have come up
11 with current regulations. The potential new
12 regulations that we have been thinking about or
13 we heard issue should be formalized into
14 regulations.

15 The Tribal Advisory Committee, now I know
16 that the last couple of, probably, tribal
17 advisory committees that the agency has worked
18 with or has set up has been very controversial
19 in Indian Country and people have felt like
20 they were not heard or utilized properly. This
21 is something we need to set the regulation how
22 those committees will be selected and set up,
23 what the process will be, when those committees
24 are in -- when they are set up, and even how
25 the meetings are conducted, the facilitator.

1 Those kind of issues, and whether or not that
2 needs to be put into regulatory form.

3 Sole proprietary interest, we had a number
4 of tribes come to us on this issue as well,
5 dealing with, you know, contract or combination
6 of contracts that perhaps looked okay at the
7 beginning but now appear to, at least to the
8 tribe, to violate this local proprietary
9 interest provisions of the act. And, you know,
10 a lot of tribes have raised a concern that we
11 need to put something out formally, whether a
12 regulation, or what have you, that defines what
13 sole proprietary interest means. And how to do
14 that we had suggestions in California that
15 perhaps one of the ways to do it would be
16 redefining primary beneficiary. It is
17 something that if you're interested in and you
18 have concerns about, we definitely need to hear
19 input from the tribes on that.

20 A communication policy regulation, however
21 this works, we have been very concerned with
22 how we communicate with you. How do we even
23 notify you of consultations? You may or may
24 not have noticed -- hopefully you noticed --
25 that when we introduced the Notice of Inquiry

1 we did everything we possibly could to reach
2 you. We did your tribal leader letters. We
3 made announcements at various venues. We
4 published the federal register, we sent it out,
5 put it on the web site. We mailed it. We
6 faxed it. We will smoke signal, Pony Express
7 it. We'll do whatever we need to do to get
8 this information to you. But there are other
9 things as we do engage in
10 government-to-government consultation our
11 obligation is to the tribal elected officials,
12 and that situation could lead to contact, and
13 then how do we make sure that some information
14 that we send to tribal counsel also gets to
15 your staff and that gaming commission or at the
16 operations. It can get very confusing.

17 Working at a tribe myself, I was just
18 lucky that I was friends with the tribal
19 counsel's staff and they made sure that any
20 information they got got to me and then I
21 filtered it down to the commission or to the
22 gaming operation. But I know that as tribal
23 leaders you get a lot of paperwork. Sometimes
24 things get lost in the shuffle.

25 We want to make sure when we put some

1 information out that it reaches everyone it
2 should. So we need your help because you guys
3 know how tribes work, certainly better than we
4 do. How can we do that and be effective?

5 Finally, the Buy Indian Act. I know that
6 the National Gaming Association has had an
7 initiative for several years, let tribal
8 operations Buy Indian from each other and we
9 are looking at our agency. When the agency
10 goes out to, for example, purchase meeting
11 space like this, that we should be putting some
12 money that funds the money from tribes, that
13 funds the agency, putting it back into Indian
14 Country. So that when we are purchasing goods
15 or services, whatever they may be, that the
16 agency is obligated by regulation to buy it and
17 put the money that we -- that you pay in to
18 fund our agency, that we put it back into
19 Indian Country, so considering the binding act.
20 We hope, you know, following the example of the
21 National Gaming Association, we think it is an
22 important thing, so --

23 Again, these are only suggestions. The
24 commission has not taken a position on any of
25 these, you know. We like some more than

1 others. We heard lots of comments. As I keep
2 getting more comments, I'm like, "oh, we didn't
3 think about that." So it is so vital that we
4 get your input, that you provide us some
5 guidance on how do we it.

6 Just a note, if you take a look -- the
7 first comment we got was from San Manuel Tribe
8 and not speaking to the substance of what their
9 comments were, but if you look at the format,
10 it was very helpful for us as we went through,
11 they identified the regulation, they identified
12 whether or not it was a issue for them, sort of
13 what priority level, what method we could
14 consider revising that regulation.

15 There is some good examples on the web
16 site of how it might be helpful to frame your
17 comments. But it doesn't matter how you frame
18 them. Send them to us. We want to hear from
19 you. We need to hear from you.

20 One other thing, going back to the
21 executive order. Again, in the same section,
22 section 3C2, this time it says "when
23 undertaking to formulate and implement policies
24 that tribal implications agency shall, where
25 possible, defer to Indian tribes to establish

standards."

So we really can look to you and, if possible, defer to the standards that you forward to us in regard to these regulations. That is something that we are hopeful will happen, that we can be -- that Indian Country can come forward and provide us with some options that we can take a look at. We're getting to be very sophisticated. We can borrow some things from what tribes are doing.

The commentary is closed next week. Everything will be posted on line. There is a bunch of information on line, including a number of comments and transcripts. You can send those comments to me at reg.review@NIGC.gov and they will be on the web site, hopefully within a day or two, but again, Mark has been really great about getting that stuff as soon as we get it.

The commitment from the NIGC, the commitment from myself is that every comment that is received, we will review it, we will consider it carefully. The regulatory review agenda will be accompanied by a summary of why we went a certain direction, why we are taking

1 a look at regulations, and in what order and
2 how we are going to work on them. We are going
3 to be accountable to you. We want to be
4 transparent. We want to tell you why we went a
5 certain direction. If we disagree with the
6 direction that tribes asked us to go, then we
7 are going to explain why. We want the decision
8 making process to be transparent. We want you
9 to understand that we are considering
10 everything that is sent to us.

11 Finally, the agenda will be completed in
12 April, likely at NIGA. You will know what the
13 direction is that we are going. And like I
14 said, from today we have approximately 18
15 months. In April we are going have about 16.
16 And so we need to move very, very fast. And we
17 will be moving very, very fast. I hope that
18 you guys will support us and that you will
19 participate because it is only with your
20 participation that we are going to come up with
21 a product that is really the best for Indian
22 Country.

23 The consultations are being recorded and
24 transcribed. If you speak, please use the
25 microphone. State your name, the tribe that

1 you represent or the organization that you
2 represent. There is still room around the
3 table for tribal leadership. If you're sitting
4 in the back -- you can sit in the back if you
5 like, if you're shy, or you can come forward.

6 Let's see what else. If you have a
7 written statement, if you read a written
8 statement, that is great. If possible, give me
9 a copy of that so that we can include it in the
10 transcript.

11 And with that, I will turn it over to
12 Chairman Stevens and we will open the floor to
13 comments from you. Thank you.

14 CHAIRWOMAN TRACIE STEVENS: Thank you,
15 Lael.

16 So I know you all have been very patient,
17 as we have been doing a lot of the talking. We
18 wanted to get that out of the way first so we
19 can do an overview and explain the purpose of
20 the meeting, why we are doing what we are
21 doing, remind everyone of what our initiatives
22 are so you can hold us accountable and just,
23 you know, do the brief overview of the Notice
24 of Inquiry.

25 Can everyone reach a microphone? If you

1 need help, let us know. We will get up and
2 move the microphones around for you.

3 We are just going to open it up for
4 comments by tribal leaders, just for the sake
5 of protocol. I would like to give the floor
6 over to the tribal leader first and tribal
7 elders, or whoever the tribal leaders
8 designate. I am happy to turn it over to
9 tribal leadership first, if we have folks who
10 have comments they would like to read in. If
11 there are any questions, you're not sure about
12 something, let us know.

13 Also, one thing. Her phone number is up
14 there. Any of you who have been trying to call
15 our office for the past week, we broke our
16 phones. We tried to install caller ID and we
17 broke it. We are going to fix it. We
18 apologize. But our e-mail works. We are in
19 South Dakota and we heard that 96 percent of
20 the reservations out there don't have access to
21 internet. But they can call and hope they get
22 through. The phone lines will come in, and you
23 may not get through to who you're looking for.
24 So we have it set up so that if the numbers are
25 not going to the right place, they will get the

1 information to us. I apologize if you're
2 trying to get ahold of us. We are really
3 trying to fix it. But e-mail as well. Part of
4 that internal stuff that we are working on, so
5 that we get up to the 21st Century.

6 So I will turn the floor over to anyone
7 who would like to ask any questions or comment.
8 The floor is open.

9 Chairman Cromwell.

10 CEDRIC CROMWELL: Cedric Cromwell. I just
11 want to compliment you on what you're doing
12 with the consultation. I think this is going
13 in the right direction. You get the stories of
14 past. Obviously we are on that path. Seeing
15 things that you're working on, I think it is
16 great. I just want to make that comment. That
17 is all. I have nothing negative to say or any
18 suggestions, because I think you've covered
19 what has been on my mind.

20 CHAIRWOMAN TRACIE STEVENS: Thank you.

21 GUY MICHAEL: I am Guy Michael, legal
22 counsel for the Chitimacha Tribe of Louisiana.
23 John Paul Darden, who is our chairman, is here.
24 He asked me to speak to some of these issues.

25 First of all, on behalf of the chairman,

1 let me thank the Seminole Tribe for your
2 hospitality for allowing this conference to
3 take place here, and also, of course, the
4 Commission with whom we have been dealing since
5 about 1993, with whom too that we have had a
6 wonderful working relationship. All
7 commissioners and staff, Cindy Altimus has been
8 terrific and we worked with Keith in our
9 district. He has been enormously cooperative
10 and helpful, and Elaine Trimble Saiz, who has
11 always made herself available to us by phone,
12 fax or any form of communication to answer any
13 questions we have. Very appreciative again of
14 the excellent relationship we have been able to
15 develop. Thank you for these conferences that
16 give us, again, another opportunity to be able
17 to confer and to learn how we can best serve
18 the tribe.

19 In terms of any substantive remarks
20 regarding the excellent presentation, there is
21 one issue that I could address, because we are
22 in the throws of it now. We don't want to have
23 individual problems. This is more of a general
24 nature. It is the idea of the sole proprietary
25 interest. And given the Wells Fargo decision

1 and the issues that arise with regard to
2 financing in connection with that sole
3 proprietary interest question.

4 We as a law firm for the tribe are asked
5 when there are financial situations to issue
6 legal opinions as to whether or not a
7 particular lending document is a management
8 agreement. It is very difficult, sometimes, to
9 do that. We appreciate the various legal
10 opinions that general counsel has issued on
11 that subject and we take from them. But,
12 again, those are all case-by-case kinds of
13 analyses. For us to then analogize those cases
14 to our cases where there may be some variations
15 becomes a little tricky. Anything that can be
16 done to maybe more formalize or standardize the
17 standards by which sole proprietary interest or
18 theory is applied, especially as it relates to
19 the banks and financial institutions. I don't
20 know if it would be workable. But one
21 potential idea might even be to be exempt from
22 those determinations, banks and financial
23 institutions that are issuing loans in the
24 regular course of business, which for the most
25 part, are not intended to be the management, as

1 we understand it, but have certain conditions
2 in them that do implicate those same areas, if
3 that kind of exemption criteria could be
4 developed within it might be very helpful.

5 I could go on and on with other comments.

6 LAEL ECHO-HAWK: Will you be submitting
7 written comments?

8 GUY MICHAEL: Yes, I could do that.

9 LAEL ECHO-HAWK: If you have ideas,
10 particularly with regard to that issue, we
11 would really love to hear them.

12 GUY MICHAEL: Okay. Great.

13 CHAIRWOMAN TRACIE STEVENS: The floor is
14 open for more comments, any questions anyone
15 might have.

16 Yes, sir?

17 ADMINISTRATOR MCGHEE: I am actually
18 here -- our vice chairwoman Stephanie Bryan
19 can't be here. She came down with the flu
20 right before she had to fly out.

21 I have a statement I would like to read on
22 her behalf, if I may. My name is Daniel
23 McGhee, with the Poarch Creek Tribe,
24 administrator of the Gaming Commission and
25 Tribal Committee.

1 "On behalf of the tribe I would like to
2 thank you for giving us the opportunity to
3 provide comment on the Commission's Notice of
4 Inquiry. And I especially want to thank you
5 for taking on the ambitious goal of revamping
6 the Commission's regulations.

7 In our review of the Notice of Inquiry I
8 would say that we share the beliefs of many
9 that we've heard speak today and at other
10 consultations. While some of the changes
11 contemplated by the Commission will benefit
12 Indian Country, we feel that others will not.

13 In particular, we strongly discourage the
14 Commission from expanding the definition of
15 management contract so that it includes any
16 contract merely because it pays a fee based on
17 percentage of gaming revenues. Just because
18 payment to a third party is based on percentage
19 of revenue does not mean that the contract
20 involves management. In our experience, these
21 contracts have nothing to do with management,
22 and thus to mandate their submission would be
23 to expand the authority of the Commission
24 beyond what was intended by IGRA.

25 Don't get me wrong, we appreciate that the

1 Commission will review these types of
2 agreements at the request of tribes to ensure
3 that they don't violate IGRA. We simply
4 believe that their submission should remain
5 voluntary.

6 We also disagree with the idea of adding a
7 definition that would require a tribe to
8 consider cash flow out before allocating gaming
9 revenues for non-gaming purposes.

10 Considerations such as these go to the very
11 heart of tribal sovereignty and right or wrong
12 tribes should be the ones making these
13 decisions.

14 With all due respect, we think it would be
15 a waste of time or a waste of the Commission's
16 time to address this issue. I would venture to
17 guess that most, if not all tribes, already do
18 this. I know we take these type of decisions
19 very seriously. After all, this is our future
20 that we are talking about, the future of our
21 members and our children. These type of
22 decisions should remain in the hands of the
23 tribes.

24 As you know, Poarch Creek operates three
25 Class II facilities in the State of Alabama.

1 Changes in the area of Class II gaming are very
2 important to us. We note in particular that
3 the Notice of Inquiry discusses the changes
4 that are under way with regard to the Class II
5 MICS and Technical Standards.

6 Along with Daniel McGhee and Linda McGhee
7 and I have been very involved in the Tribal
8 Gaming Working Group's review of the MICS and
9 technical standards. In fact, we spent all day
10 yesterday discussing them and will continue to
11 do so today and tomorrow. Tribal regulators,
12 vendors and other industry experts from all
13 over the country have been participating in
14 these meetings in an effort to develop a
15 revised set of regulations that are better
16 suited to Class II gaming. I truly hope that
17 the work product of this group will be given
18 great deference as the Commission considers how
19 it will ultimately revise its regulations. And
20 Hopefully this group's work product can serve
21 as the starting point as a Tribal Advisory
22 Committee that then works to craft final
23 regulations.

24 But one last substantive note, the idea of
25 revamping the commission regulations on

1 self-regulation is of great interest to the
2 tribe. If done properly, we think this action
3 alone could alleviate a lot of the pressures
4 experienced by the Commission on a daily basis.
5 If the regulations were more practical, and
6 more clear, more tribes would take advantage of
7 this program and even more of the daily
8 regulatory responsibilities could shift to the
9 tribes. Notably, this is exactly what IGRA
10 envisioned. With the involvement of the Tribal
11 Advisory Committee we believe that today's
12 overly burdensome regulation can be crafted
13 into something that will more closely model
14 what was intended by congress when it enacted
15 IGRA and we look forward to working with
16 commission on this.

17 Finally, I wanted to be sure to note a
18 concern that we have with the enormity of the
19 task being undertaken by the Commission. I
20 have only discussed a few of the topics raised
21 by the Commission in the notice. There are
22 many more that you are considering, most of
23 which will take time to adequately address. As
24 you've noted, your terms are not endless. As
25 such, we want to stress how critical it is that

1 the Commission set priorities and that it work
2 closely with Indian Country as it moves
3 forward.

4 Even where the Commission decides not to
5 act, it is important that it leave a record
6 detailing the reasons for such inaction. Doing
7 so will benefit the industry greatly as new
8 commissioners take office and assess their own
9 priorities. And by using a combination of both
10 Tribal Advisory Commission and notice and
11 comment rule making and by working closely with
12 the industry we think the Commission will go a
13 long way towards attaining its ambitious goals,
14 otherwise, we fear that very little can be
15 accomplished.

16 We thank you for your time."

17 I apologize, Ms. Bryan wanted to read this
18 herself, but she asked me to do that.

19 I would note when she asked me to look at
20 the regulation or self-regulation, and she
21 asked if that would be something we would be
22 able to do, as I was reading it, I could not
23 answer her question. It was very vague. It
24 was very subjective. She asked and I said I
25 don't even know if we would imply or try to

1 reach this criteria, if we could do it or if it
2 would be a waste of our time.

3 In short, I would recommend that you be
4 much clearer. The criteria be set down to
5 where I know I have to do this, this and this.
6 And if I can do those things, then I have a
7 good chance of, you know, obtaining
8 self-regulation.

9 I also think that the criteria should be
10 less objective, meaning if I submit an
11 application on whatever self-regulation, the
12 decision I would get from your commission would
13 be the same the decision I would get from any
14 other commission, because it is very black and
15 white. It is not left up to, you know, how you
16 felt or how you thought. So those are comments
17 on self-regulation.

18 CHAIRWOMAN TRACIE STEVENS: And thank you
19 for your comments. Will your tribe be
20 submitting written comments?

21 ADMINISTRATOR MCGHEE: Yes.

22 CHAIRWOMAN TRACIE STEVENS: This is a
23 concern that we have heard throughout our
24 consultations, self-regulation regulation is a
25 bit older, and in that time other regulations

1 have been adopted by this agency. We only have
2 two tribes, two out of 233 that are certified.
3 One was mandated, so one was voluntary.

4 So we are certainly open to ideas. First
5 if this is a priority, but also because it
6 hinges -- self-regulation will also hinge on
7 the other regulations that we are dealing with.
8 We need to know what your priority is on this.

9 So the floor is open again for those who
10 have comments. It looks like we have someone
11 in the back. No.

12 MR. BLUEDOG: My name is Kurt Bluedog. I
13 am here representing Shakopec Mdewakenton Sioux
14 Tribe. I have a question: When you're talking
15 regulations here, I am curious as to the
16 authority and oversight of the various federal
17 agencies. Are you able to tell the FAC and
18 staff what the oversight role would be with
19 regard to the regulations revised or
20 promulgated by the NIGC with respect to
21 oversight on the part of the Department of
22 Justice and perhaps the Department of Interior,
23 particularly with those issues related to
24 things like Class II definitions and other sort
25 of maybe more controversial type comments?

1 I am curious in terms of what the
2 perspective of the commission is with regard to
3 your authority to move forward with
4 regulations. And, obviously, I know that
5 you're mandated by the statute to implement the
6 regulatory act.

7 Have you had any problems, I guess, in
8 terms of oversight or sort of bumping? I know
9 several years ago the Department of Justice --
10 there was a real split between NIGC and the
11 Department of Justice, particularly with Class
12 II definitions. I think there has been other
13 instances as well. I don't mean to put you on
14 the spot or put you in a bad position, but I am
15 curious as to the extent of your authority on
16 these regulations.

17 CHAIRWOMAN TRACIE STEVENS: Well, as you
18 said, it is mandated in the act. And, you
19 know, I am on the tribal side when there were
20 issues with other agencies, whether it was
21 Interior or Justice. And what I can say about
22 this particular administration is that we are
23 not having those issues right now. The
24 administration has been very clear to all of
25 these agencies, the executive branch that, you

1 know, we should be providing consistent, good
2 government to those we serve.

3 So just to address that issue, and you
4 know, I guess any particular commission can
5 interpret the act how they want about what
6 their authorities are, because that is how
7 policy is. That is where policy comes in. It
8 is an interpretation of what we are -- what our
9 statutory mandate is.

10 That may come out more as we move forward
11 in putting this agenda together. But I will
12 say this: We are not necessarily wedded to
13 regulations, because we are here talking about
14 regulations. We are talking about mostly the
15 existing regulations.

16 We had several people say "why do you all
17 keep wanting more regulation?" Today the
18 discussion is not necessarily about more
19 regulation. What this discussion is about is
20 what is going to be best to protect the
21 industry. That may not necessarily mean more
22 regulation. It may be refining the regulation
23 that exists now. That is a natural response,
24 given the history, to continue to see more,
25 reach and more -- more regulation. For this

1 commission that is not necessarily going to be
2 the outcome.

3 What we are interested in is making sure
4 that we stay within the statutory authority as
5 we understand it, and that we work to -- we
6 work with you to safeguard this industry
7 however that might be. It may not necessarily
8 be regulations.

9 We heard a lot about standards, because
10 the act does talk about standards and
11 regulations. And we are getting lots of
12 suggestions about issuing standards or
13 bulletins or guidelines or industry best
14 practices, especially in areas where it might
15 be gray, especially in light of the Colorado
16 Indian Tribe Decision.

17 I am not sure if that answers your
18 question.

19 MR. BLUEDOG: Just a brief follow up.
20 When you do devise regulation or new regs it
21 would seem that there would be a process to vet
22 those regs with any administrations. I am not
23 sure how that process works. It seems like the
24 office of management and budget is
25 administratively involved in the distribution

1 that to the other affected federal agencies,
2 and they have an opportunity then to approve or
3 disapprove and otherwise comment or possibly
4 even more than comment. Maybe you haven't
5 gotten to the point where you've had to deal
6 with that yet in terms of this administration
7 or the NIGC.

8 I am just wondering if you had any
9 thoughts on that. You don't anticipate any
10 problems, but that may happen. I am just kind
11 of curious as to how that process might work.

12 CHAIRWOMAN TRACIE STEVENS: Well, thanks
13 for bringing that up, because actually we have
14 been thinking about it. It's one of the first
15 things we started talking about. I am looking
16 for my lawyer, but I think he walked out of the
17 room.

18 We are talking about that, because the
19 previous commission, it seemed or it appeared
20 to me, as being on the tribal side and now
21 coming in as the new chair -- how do I say
22 this? I am trying to view their independent
23 regulatory status, their independence very
24 broadly.

25 I am probably not as -- I am not that

1 like-minded about that. I think we have
2 independence for purposes of enforcement
3 action, because we want to be free of the
4 politics when we have to, you know. We have to
5 make sure that the industry is protected. We
6 have to do that with you.

7 But if you read the statute, we are within
8 the Department of Interior. The normal courses
9 you put out of regulatory review, it does go
10 into OMB. I do a lot of outreach. We do a lot
11 of outreach because we take the president's
12 directive to work with sister agencies
13 seriously. Even if it is not formalized, we
14 are checking in with other agencies to make
15 sure that we are not creating inconsistency or
16 that we are causing a problem that we don't
17 mean to cause.

18 I do that quite a bit, and we reach out to
19 justice. We reach out to -- we are working
20 with the treasury on some things. We worked,
21 of course, with the Department of Interior
22 quite a bit. We are looking at that question.
23 It is a question I had immediately coming in as
24 having gone through the exercise, working for
25 the Department of Interior for Indian affairs

1 there was a process you went through that
2 always involved everything going over to OMB,
3 to their regulatory folks, and then having to
4 work with other agencies to make sure that we
5 didn't get in the crosshairs. That is their
6 job. That was not a practice before. So we
7 are looking at how we go about that, even if it
8 is determined, you know, we do have some
9 independence. There is some courtesy involved
10 too, and to make some assurances, to ensure
11 that we are not creating more problems than we
12 are trying to solve inadvertently.

13 So I don't know if that addresses your
14 question. It was on my mind immediately having
15 come out of the DOI, and looking at the process
16 and supporting the government initiative. We
17 don't have an answer yet on that, but we are
18 working with the White House, who the OMB works
19 for, to examine to what extent do we involve --
20 we work with OMB. Whether it is mandatory or
21 involuntary, but either way, we don't want to
22 get into those crosshairs either.

23 Yes, Chairman Stevens.

24 CHAIRMAN STEVENS: Thank you, Madam
25 Chairwoman. I have prepared some statements

1 here, so I don't want to go too long. I
2 appreciate the opportunity. I was sitting
3 right across from my boss so I will try to be
4 as quick as I can.

5 Again, good morning. I wanted to say that
6 it is an honor to be here. I appreciate the
7 hospitality, the Seminole Tribe of Florida.

8 I also wanted to acknowledge Kurt Bluedog
9 who just addressed us as a longstanding board
10 member of the National Gaming Association. I
11 just wanted to just take us through a brief
12 statement on behalf of the National Gaming
13 Association.

14 The past eight years tribal governments
15 has had to deal with a commission that has
16 failed to appropriately acknowledge primarily
17 regulatory authority of tribal governments. I
18 hope I said that as best as I could.

19 Instead of appropriate dialogue in
20 collaboration and its issue overreaching
21 mandates, in spite of these overreaching
22 mandates the tribal leadership has worked
23 within the law to make gaming the success that
24 it is today.

25 Your track record, the current

1 commission's track record, work in progress is
2 an indication that the tribal leadership has
3 had a consistent opportunity to engage in a
4 productive, respectful dialogue. I think that
5 we are encouraged by that, and we're excited by
6 that. But, again, it's a work in progress.
7 The ultimate reflection is what is the most
8 important to leadership. I just want to say
9 quickly that we wish the best to your health,
10 your energies and your families, because we
11 know all these leaders and the teams that
12 represent us live this world of tribal and
13 dialogue, so again, our best to your families.

14 I wanted to make sure that we made clear
15 that when it is all done, it is our hope and
16 desire that the product will reflect a
17 significant voice by the tribal government
18 leaders throughout any country. We are excited
19 by this, but at the same time, because of the
20 history, we continue to assert the need to hear
21 the leadership and their teams in a productive,
22 respectful manner. That is something we can
23 bring forward. Of course we invite you and the
24 rest of the leadership here to our trade show
25 in April. We think there is a significant

1 opportunity to have dialogue with a large
2 consortium of leaders in the gaming world. We
3 acknowledge the time and tremendous energy
4 performed by this commission and staff, the
5 commitment and outreach and willingness to seek
6 out tribal leadership position is truly
7 unprecedented. We thank you for that.

8 At the same time, the hard decisions are
9 yet to be made. And I think that that is
10 really what I want to -- really want to assert
11 to everyone here. We have a lot of work to do.

12 You know, in closing I would like to say
13 that Indian gaming has always been about
14 self-reliance and self-governing. While we
15 appreciate the strong partnership and working
16 effort, federal regulations must acknowledge
17 that tribal regulatory agencies are the primary
18 regulators of Indian gaming.

19 Again, we look forward to the product and
20 we invite you to the show. I really think, you
21 know, I am hesitant to be excited about all
22 this product until we can roll it out, until we
23 actually take opportunity to roll your work and
24 our work into the hands of leadership at our
25 show in April.

1 I think at the same time, you know, I am
2 hesitant only because history, but the product,
3 the effort put forward we don't want to take
4 anything from that. As a matter of fact, I
5 want to make sure that on behalf of the 184
6 tribes that I represent we say thank you. It
7 is a new time of communication and dialogue.
8 That is why I acknowledge you, your family and
9 your team. I thank you for that.

10 In closing, I just wanted to acknowledge
11 your chief counsel, Mr. Larry Roberts. He is,
12 by coincidence, we happen to be sitting next to
13 each other. We are not trying to get -- we are
14 not trying to get any pull with him or anything
15 like that.

16 God bless his late grandmother who just
17 passed away and my grandmother who were
18 friends. We both went back and forth in the
19 big city. My grandmother is still hanging in
20 there at 100 years old. These two ladies are
21 pioneers, that had preserved Indian culture,
22 and allowed us to be who we are. I just wanted
23 to acknowledge Mr. Roberts in that way, these
24 elders that keep our communities going. We
25 have so many here in this country. I wanted to

1 acknowledge their energy and spirit as we move
2 this forward. Ultimately, what we do here is
3 our success and future. I thank you for your
4 time today, Madam Chair.

5 CHAIRWOMAN TRACIE STEVENS: Thank you,
6 Chairman Stevens for all those words. I was
7 telling Dan that the Oneida of Wisconsin over
8 there, he said no, it's really the Packer fans
9 over there. All in good words.

10 And we said -- we all said, all the
11 commissioners said that we recognize the tribes
12 who are the primary regulators. It is a
13 virtual impossibility the way things are now
14 and within our statutory authorities for that
15 to be us. It is impossible.

16 Having come from a tribal operation and
17 working from a tribal leadership we all, you
18 know, have had -- all of us, the commissioners,
19 our products of Indian gaming and the staff
20 that we've appointed, Larry Paxton and we have
21 others, Lael, deputy chief staff. We all are
22 from Indian Country. We recognize that the
23 tribes are the ones who are on the ground 24
24 hours, seven days a week. You are the ones who
25 are going to have to implement these

1 regulations. You know what is best for your
2 operation. If anything, tribal is the one who
3 have the most vested interest in protecting
4 them. And what we have said, and what we tried
5 to do is we try to go outside just the
6 operation because we know that there are lives
7 at the other end of this of what we do, the
8 decisions we make ripple out and there are
9 people at the other end of these decisions. It
10 affects your operations. It affects the much
11 needed resources you have available to you to
12 serve your community's people. And so we
13 recognize that.

14 We look forward to working with everyone.
15 It is not always going to be perfect. We are
16 not going to be perfect. We may not always
17 have the answers, but we look forward to
18 everyone coming to the table and identifying
19 the issues, but helping us solve them too.

20 I understand, and we heard it pretty
21 regularly since we have been on the road, that
22 there is a caution that people have. The
23 tribes have been approaching us because the
24 history over the past eight to 10 years. And
25 what I say to that, and what we were reminded

1 of by the Oglala and the leaders from the Great
2 Sioux Nation, we are going to be judged by our
3 actions. I can come in here and talk and talk,
4 and be yet another federal official that talks.
5 I know that my actions will speak more, and
6 that is what the history will show, or what we
7 do. So this is just the beginning of the steps
8 that we are taking, the action. So I
9 appreciate that and I understand the caution
10 and the hesitancy that tribes have, in our
11 efforts. But all we can do is ask that you be
12 involved, that we will include you and we will
13 inform you.

14 So thank you, Chairman Stevens.

15 Chairman Cypress.

16 CHAIRMAN MITCHELL CYPRESS: We will
17 probably be submitting written comments
18 regarding the regulations at this time.

19 CHAIRWOMAN TRACIE STEVENS: Announce
20 yourselves and then after these comments we
21 will take a break to stretch our legs. I don't
22 mean to rush you. I want to let everyone know
23 that we will have a break after this comment
24 and we will come back.

25 MR. WEBSTER: Thank you, Chairwoman

1 Stevens. I am an attorney with Seminole Tribe
2 here with Ed Jenkins. And we have been asked
3 to provide a few specific comments on the
4 Notice of Inquiry and the regulations that
5 you're reviewing.

6 As an additional matter, we absolutely
7 agree with the comments that were made this
8 morning, the appropriateness of the process the
9 commission is using with the Notice of Inquiry,
10 and the respect that it demonstrates in terms
11 of soliciting the views from Indian Country
12 before the Commission makes a decision about
13 which regulation it is going to undertake and
14 both the process and priority.

15 So, again, we certainly commend the
16 commission and the approach it is taking and
17 look forward to working with the commission
18 over the months ahead as this process moves
19 forward.

20 In terms of specific regulations, we do
21 believe our priorities of the Commission should
22 focus on, and I will say the tribe will be
23 following up with written comments as well.
24 First of all, the Part 518 self-regulations, we
25 very much agree with the comments that have

1 been made earlier and the commission's own
2 recognition that Part 518 has been seriously
3 flawed.

4 As we read the statute, the statute sets
5 out a process for self-regulation and frankly
6 sets that -- we think it is the goal the
7 commission should be working with tribes. You
8 get tribes to the point where tribes are
9 self-regulatory. And the regulations that have
10 been in place now for many years are not just
11 burdensome and sort of the cost benefit
12 analysis you talked about, we think they're,
13 frankly, contrary to the statute. In terms of
14 imposing of both requirements to achieve
15 self-regulation and then once the tribe has
16 attained self-regulation, imposing requirements
17 that go so far beyond the statute that there
18 is, frankly, no benefit to being
19 self-regulated.

20 So we really think this is an area where,
21 for a variety of reasons, this should be at the
22 top of the -- top of the commission's list in
23 terms of areas where the regulations can be
24 revised.

25 Because this is such an important issue,

1 and because we know that certainly tribes
2 around the country are going to have their
3 views on this and suggestions in terms as to
4 how this might be done, we think in terms of
5 the process that the negotiated rule making
6 model is one that would really work well for
7 Part 518. Again, we strongly suggest that the
8 commission prioritize a complete revision of
9 Part 518.

10 The issue with both MICS and technical
11 standards that you referred to earlier is one
12 also that is important to deal with and we also
13 agree with the concerns that it not suck all
14 the air out of the room. It's absolutely
15 important to deal with to make technical
16 standards. But these other issues are
17 important as well. We recognize that they're
18 both from the commission side and tribal side,
19 and it will be important to have multiple
20 tracks going on these various rules.

21 We also believe that, depending on the
22 type of regulations that we are looking at,
23 different focuses make sense. So, for example,
24 on the Part 518 we think that the negotiated
25 rule making model is one that the Commission

1 should use.

2 With respect to the MICS and technical
3 standards, we believe that the Advisory
4 Committee model can work, but we also agree
5 with the comments that were made in terms of
6 some of the problems in the past. So we really
7 think that if the Commission does decide to
8 used Advisory Committees and it's critical the
9 process be opened, the tribes be able to
10 participate and have their representatives
11 participate without the sorts of limitations
12 and restrictions that were in place before.
13 But because of the technical nature of the
14 regulations we think the expertise is out there
15 and has been assembled. We think continuing or
16 establishing a representative Advisory
17 Committee for these different regulations would
18 be appropriate.

19 With respect to the facility license
20 regulations, 559, frankly we think the best
21 approach would be for the commission to rescind
22 these regulations. The facility license
23 regulations, the predicate for them is a
24 requirement in the statute that the tribes
25 license their facilities. And as we read the

1 regulations it really seems as though the
2 commission has coopted that tribal requirement
3 and materials are submitted to the NIGC in
4 advance.

5 We also think -- this is whether
6 regulations are necessary or not on this next
7 point, I think is an open question. We think
8 that this is one where Mr. Jenkins will have
9 some comments. The process for retaining
10 license information, particularly negative
11 information is one we think has some flaws that
12 could be improved.

13 I am going to give the mic to Mr. Jenkins.

14 MR. JENKINS: I've had a lot of
15 discussions with Cindy on this. This is where
16 the background investigators to the tribe do
17 the background investigations and suspend and
18 revoke license through a revocation hearing and
19 notification forms is sent into NIGC.

20 When other tribes call in and go through
21 the tax system, I am told by Cindy, that they
22 can't release the negative information to a
23 third party. So what happens is the other
24 tribes are calling in saying "what's the deal?"

25 And I just think if you have a TAP portal,

1 the portal there that, if it's a legal hold up,
2 whatever, if I put in information and we stand
3 behind them, the commission stands behind them,
4 send it to NIGC, why waste the tribe's time in
5 releasing the information? I don't know how
6 it's legally achieved. This is only regarding
7 the backgrounds. And I know, unless it has
8 changed, that it's not mandatory for tribes to
9 do vendor registration background, but the same
10 thing would hold true. We have over 4,000
11 vendors that we vendorize through the vendor
12 program. That is an on-line program. So if
13 there's a tribe out west or anywhere in the
14 country that wants to know is that a good
15 vendor, what do you think, Seminole, we could
16 use the same database and go in.

17 Thank you.

18 MR. WEBSTER: The tribe may have some
19 other suggestions, but we really think that
20 these issues are the ones that are, from the
21 Seminole Tribe's perspective, they should be
22 the priority at this point. But, again, we
23 appreciate the approach that the commission has
24 taken and look forward to working with the
25 commission as this process moves forward.

1 Thank you.

2 CHAIRWOMAN TRACIE STEVENS: Thank you.

3 I do want to say I appreciate those
4 comments, in particular, about information and
5 how the NIGC can help tribes do their jobs.

6 As I said in my opening statement, a lot
7 of the time that we are spending right now is
8 our internal operations. That means we have to
9 come up to the 21st Century. We need to be
10 able to put these systems in place. And
11 frankly, I think we agree with you.

12 We will have to figure out, and I look at
13 my lawyer, how we -- if and how we can do
14 that -- first, if we can do it. And when we
15 get over that hurdle, the how is going to be a
16 challenge for us because we are not in the 21st
17 Century. We have some system infrastructure in
18 our technology that needs improvement. I am a
19 big fan -- I come from a tribe that has a very
20 aggressive technology system. I expect the
21 same thing. If there is other federal agencies
22 that -- you know, I am not into reinventing the
23 wheel so I can call it my wheel. If someone
24 else has -- other agencies have systems that we
25 can duplicate or that we get some ideas from so

1 we can make everyone's minds easier, including,
2 more importantly the tribes, that would be
3 great. We know the limitations of the TAPS.
4 So we know the limitations of the TIMIS
5 program. We want to fix those and streamline
6 them. So I appreciate those comments. I do
7 want to put everyone on notice that it does --
8 it's going to take a lot of work on our part.
9 We agree to just the concept of being able to
10 have systems in place that work. This is going
11 to take a lot on our part to put them there.

12 If everyone is okay, I would like to take
13 a break so we get up and stretch our legs, use
14 the rest room, get some fresh water and coffee.
15 Come back in 15 minutes, which will be five
16 after 11:00. Thank you.

17 (a recess was taken)

18 CHAIRWOMAN TRACIE STEVENS: We have others
19 that would like to come up to the microphone.
20 That is Judy?

21 JUDY SHAPIRO: Good morning. My name is
22 Judy Shapiro. I have been asked to speak on
23 behalf of Cheyenne River Sioux Tribe. I would
24 like to thank the Seminole Tribe.

25 Cheyenne River Sioux Tribe is,

1 unfortunately, still embracing great poverty
2 right now up in the plains. They have a very
3 minimal gaming presence there. They are
4 looking to revitalize their gaming life there.
5 But they're in South Dakota, and it's not
6 simple. It is not simple because the
7 compactness of South Dakota, I'm sure you're
8 aware, is not straightforward. They're looking
9 to improve their compact situation. They're
10 also looking with an eye towards even if they
11 can't improve their compact situation, they're
12 probably going to want to do Class II gaming --
13 to make sure that we are not talking about more
14 regulations. We are talking about better
15 regulations. We are talking the about the MICS
16 and the technical standards and the work of the
17 last eight years where many of you were on the
18 other side trying to hold the line trying to
19 make sure that it would still be a class II.
20 They're never going to have a market like this.
21 But they need to have a market that will take
22 them to a better level of poverty.

23 Right now, they're remembering a year ago,
24 I think it was 17 years without power and water
25 on rez. They got taken out again in the

1 summer. They need to -- you're talking about
2 going to the 21st Century. They need an
3 opportunity to have Class II until such time
4 that they can have meaningful Class III. That
5 may not come. So they need that.

6 As Joe said, I know, I know that you're
7 aware of efforts that the tribal gaming were
8 going to put in to try to make it a Class II
9 standards. They're much, much better than they
10 would have been, but they're still not what
11 they ought to be.

12 And I agree that the -- that should be a
13 priority, because it is a work that was partly
14 done and partly not so well done. It is an
15 opportunity to take the resources that were
16 developed back then over several years worth of
17 resource commitment and concentration. And it
18 is still going on across the hall, because the
19 same people are doing similar work with the
20 anticipation of it coming up before the
21 commission again.

22 And when it does, I urge you, I urge you
23 to use these resources. The NIGC is doing good
24 things in terms of where it is trying to go.
25 But it will never have the resources that

1 Indian Country is bringing to bear, because
2 it's Indian Country's problem and it's Indian
3 Country's priority to make sure that these
4 opportunities continue to exist.

5 So I urge you as, one, to make Class II
6 improvement a regulatory priority. And then,
7 two, to make sure you use those resources to
8 the best of your ability. And to go with an
9 approved Tribal Advisory Committee that can be
10 worked out, and to make sure that not only do
11 you have good representative members of the
12 community, but you have the ability to
13 assimilate the information that all the
14 associated tribal community can bring to you.
15 That's it. That is the most important thing we
16 need to do today.

17 I agree also with what Joe Webster said
18 before. I think the facility licensing
19 regulation should be withdrawn. I think it's a
20 mistake. I think it was improper that it was
21 promulgated and it is defective. I think that
22 you're better off going back, consulting the
23 tribe and finding a better regulation, not more
24 regulations, but better regulations. Probably
25 a separate consultation of that issue alone

1 would improve that in that context. I think
2 that is really what I need to do.

3 The other issue is that Cheyenne River, in
4 the course of revitalizing its gaming, has done
5 a lot of good training program out there. It's
6 going to want to have a good differentiation of
7 what the NIGC can do and what its
8 responsibilities are, which means addressing
9 the aftermath of CRIT more appropriately.

10 Guidance is very good, but it should be clear,
11 what is the NIGC's role and what is the tribal
12 role? I think that is something that ought to
13 be a priority in terms of addressing the Class
14 III MICS.

15 Having the information out there as
16 guidance, as bulletins, or whatever form turns
17 out to be useful, because I know it's a
18 complicated setting, but there should not be
19 confusion that would set tribes up in a bad
20 place where the NIGC really doesn't have
21 authority to regulate, but it's not going to be
22 so clear to outside.

23 I think that that clarification is
24 something that we should be focusing on. Thank
25 you.

1 CHAIRWOMAN TRACIE STEVENS: Thank you,
2 Judy.

3 I do want to remind everyone that
4 technical assistance and training is a priority
5 of ours. The purpose of the training survey is
6 so you can get a better understanding of what
7 the tribes in each region need, and how we can
8 tailor our training to meet those needs.

9 The survey is in on the web site, if you'd
10 like to take a look at it. But, also, we have
11 to go through all of our training material that
12 exists right now and make sure that it complies
13 with the policy of this commission.

14 That goes to your point, Judy, about
15 making sure that we don't cross lines. So we
16 are in that process. It's part of the
17 technical assistance and training initiative,
18 but it's also part of our management, our
19 agency operations is how we allocate our time.
20 The majority of our budget, 80 percent -- well,
21 let's say 75 percent is human capital staffed,
22 and you all know how that works. Staffing
23 costs money, salaries, wages, taxes, benefits,
24 and all the overhead costs associated with
25 having one person on board. That is the

1 majority of our budget. We have a fixed cost
2 that go into that.

3 The best thing we can do is look at how we
4 are spending our time. How people in the field
5 are spending their time, and refocusing that
6 towards the areas that we want them focused on,
7 one of which is technical assistance and
8 training.

9 We don't want them on other agendas, other
10 priorities. They have to be working on
11 priorities that we set for them and those
12 priorities are based on what we hear from
13 tribes. Technical assistance and training is
14 one of those initiatives, and we are moving our
15 staff towards more of a technical assistance
16 and training mode, but there is many moving
17 parts that we have to correct to make sure that
18 we give tribes like Cheyenne River what they
19 need. We would like your patience as we make
20 those changes.

21 JUDY SHAPIRO: We will be working to make
22 sure we get you that information.

23 CHAIRWOMAN TRACIE STEVENS: Daniel, right
24 up to your mouth so we can hear you.

25 MR. MCGHEE: I did want to bring up a

1 couple of points I thought about while I was
2 here, and that is the regulation 556 and 558,
3 which is when you're doing the background, and
4 the criteria -- because those were a long time
5 ago. I think it would be beneficial to revisit
6 those regulations.

7 I noticed from the slide show earlier that
8 the pilot program for licensing, I don't think
9 it is clear how someone can be a part of that.
10 A lot of paperwork for you guys, for us. It is
11 very burdensome. But I also think a lot of the
12 information that was originally requested,
13 requested or required to being on the
14 background application could be revisited. I
15 think a lot of information we have to ask for,
16 but necessarily everyone -- help with
17 determining what is actually useful, what we
18 need or don't need. Those are regulations, and
19 I think, maybe that is the same time you can
20 address similar concerns about the TAP Program.
21 Also, the MICS that you're currently working
22 on, I think the way which it is going is trying
23 to go in and take a lot of detail, a lot of
24 things that may be procedures or standards, and
25 I agree with that, to what is happening, but at

1 the same time I do have a concern that NIGC
2 understands that if that were to be the way
3 that MICS goes in that direction, that they in
4 turn might have to look at a lot more
5 bulletins. I think you call them samples, for
6 tribes. Because when we first started out we,
7 you know, had nothing so we took a MICS. But,
8 you know, as you grow you start to understand
9 it more, your TICS grow.

10 Also, the Advisory Committees, and I think
11 that was also fair, our suggestion will be I've
12 noticed as being part of some those advisory
13 committees, to not take away some fairness
14 issues and representation issues, that this can
15 figure out a way to make some of the advisory
16 committees smaller. Being that we have a large
17 representation, many different people, but it
18 can sometimes bog it down and make it go
19 forever. I don't know that you have an
20 advisory committee to figure out how to make a
21 better advisory committee, but I think, or if
22 you have to have a advisory committee, maybe
23 bring them into a smaller subcommittee to
24 actually get something accomplished a lot
25 quicker. I think that would be more

1 beneficial.

2 For instance, with the MICS you have all
3 these different sections that you can pick one
4 person from the tribe, but no one person is
5 going to know IT, case surveillance. Usually
6 it takes different kind of people submitting
7 data. That will be something we had different
8 committees handle different portions. I don't
9 know how it has to work, but that is something
10 you can get products produced quicker, and a
11 better sense of everyone's thoughts, just to
12 consider those things.

13 CHAIRWOMAN TRACIE STEVENS: Thank you. I
14 appreciate you bringing up, sort of, the
15 challenge that we are faced with, and technical
16 advisory committees is one example. Just
17 generally MICS and Class III and mechanisms,
18 because it is so different. We are in
19 California in two cities, and there was a clear
20 divide between the tribes, Class III and the
21 MICS regulation and enforcement. And there was
22 a clear set of tribes that did not.

23 I think what this highlights to me is the
24 need for mechanisms that are flexible to work
25 for as many of the tribes -- all the tribes.

1 My desire is there are flexible mechanisms in
2 place to meet all of these diversities of
3 tribes and that we have as much coverage as we
4 can and make sure that we protect the industry
5 at the level of protection being led by the
6 tribes is primarily regulators. There is
7 nobody left behind. So we are going to be
8 looking to tribes for solutions. I think that
9 what we are hearing, and we are open to the
10 flexibility, not just with the Class III MICS,
11 but also with tribal advisory committees. They
12 suit the need of the committee, the objective
13 of the committee.

14 I am a big fan of facilitators, having
15 come from the tribal side, but also from
16 Department of Interior. They serve as a great
17 traffic control. They serve as a neutral party
18 to help the group come to a decision and move
19 them toward to their objective rather than get
20 bogged down, because I sat in all those
21 meetings for years. I got stranded in Dallas,
22 like everyone else. It's beneficial to have
23 that kind of environment. I know that early
24 advisory committees had facilitators.

25 You know, in a perfect world to me you get

1 a diverse enough group and you check with
2 tribes that are on that group should look like,
3 and it's well represented by those who have
4 interest but you set the ground rules when they
5 there is this agreement. You don't bog down
6 for hours going over one word. You break up
7 the fights. You have a referee in the room,
8 and everyone has to stay on the ground rules,
9 so that you can get to -- you can finish.

10 I am all for flexibility on whatever the
11 subject is. And if that means we have
12 subgroups, I want them to be timely. I want
13 them to be thorough. Maybe I just want my cake
14 and want to eat it too. They have to be quick,
15 timely but they have to be thorough.

16 So I think there is a way we can do this.
17 I think the overall goal is flexible, and not
18 rigidity.

19 It looks like Judy has something to say.

20 JUDY SHAPIRO: I want to add one more
21 thing in response to what you're saying. As
22 you look toward developing these regulations,
23 one of the things that would break up some of
24 the fights and disagreements would be to make
25 more use of tiered regulation. And this is

1 something that we talked about a lot, and the
2 earlier MICS you used more, and I think it is
3 important to keep that in mind because there
4 are tiny places and there are big places. And
5 I think that once that flexibility is built
6 into the regulations, I think that you may find
7 you have fewer cause for arguments, because
8 there are some people that say this should be
9 our standard, and you will have others that say
10 we can't possibly meet that standard. If you
11 take into account the contextual basis for
12 those arguments, you might be able to solve
13 problems.

14 CHAIRWOMAN TRACIE STEVENS: Thanks, Judy.
15 She was talking about for the people who could
16 not hear her back there, the tiered that the
17 regulations -- some folks behind you -- tiered
18 regulations for large, medium, small size
19 operations. What might be completely doable
20 for one tribe will undo another tribe in terms
21 of requirements.

22 Do we have other folks that want to step
23 up to the microphone that have questions,
24 clarifications, statements?

25 MR. GREEN: I promise to be nice. My

1 comment is going to be about the tiering issue.
2 The previous commission, I don't think, fully
3 grasped, although a number of us did, that in
4 its regulations what it sought to do was make
5 audits easier. And if you're a sizable
6 operation, your gaming commission management is
7 all in favor of that. If you're a sizeable
8 operation you want to make your audits easy.
9 But if you're a place, as Judy pointed out,
10 that is in Montana or in the Dakotas where you
11 are just barely making a profit, the addition
12 of an accounting requirement for you to add a
13 certain type of electronic accounting which you
14 have to go purchase, can make your entire
15 operation unprofitable.

16 If you have been doing it with a hand
17 count for 20 years we should not make it
18 illegal to continue doing it by hand count. I
19 understand it's not as accurate as, perhaps, a
20 double electronic check, but the whole point of
21 the tiering is that we allow those small
22 operations to continue in the manner that they
23 have proven over the last 20 years to be
24 capable of operating.

25 It is -- the smaller place is too with

1 tribes that are the least profitable for what
2 they are mostly likely to open or maintain.
3 And the tiering is essential because it doesn't
4 put the financial requirements in front of you
5 to get the doors open with a small operation.

6 That is the point I want to be sure that I
7 got across today, that tiering, smaller
8 operations in places that need that smaller
9 amount of income more than any other location.
10 Get the doors opened and keep the doors open.
11 While you're going to see larger tribal
12 operations suggest, yes, these are great ideas,
13 because we need the same concept. That is what
14 you accomplished with the tiering.

15 Thank you.

16 CHAIRWOMAN TRACIE STEVENS: Thank you. Do
17 we have other comments, questions?

18 I know many tribes are, again, back to the
19 caution element here, but also listening. That
20 is the beauty of having an open forum. Many
21 tribes are listening to hear what other tribes
22 have to say and will respond to see if it
23 offers opportunity for agreement or
24 disagreement, ideas, suggestions that the tribe
25 can necessarily think of when developing their

1 comments. So I understand that there is more
2 listening happening.

3 We are a little early for lunch. If you
4 folks would like to break for lunch, if there
5 is a burning desire to speak right now.

6 Oh, yes, sir, Mr. Frank.

7 MR. FRANK: I am one of the old dinosaurs
8 of the gaming commission. I am still in the
9 18th, 20th Century -- 19th, 20th Century. But
10 I guess during my time when the gaming
11 commission was created, I think NIGC had a lot
12 of role involved in creating the passage of the
13 law and a number of tribes that are sitting
14 around here that were very active, and their
15 attorneys in developing the law, as well as
16 helping me especially when I was on the
17 commission to talk about the regulations in the
18 tiering process with some of the things that we
19 had discussed. But also, at the same time, I
20 think they also brought up a number of issues
21 where the staff attorney brought up regarding
22 background checks, things of that nature, in
23 the establishment of the relationship with the
24 FBI, creating the avenue for tribes to get
25 access to background.

1 A lot of issues were laid out and are
2 still issues today. So I am glad that it
3 wasn't too far off on issues that other
4 associate commissioners at that times were
5 discussing. I do think that there is time to
6 review the process and update, as it has been
7 pointed out this morning.

8 But the most bottom line thing that I
9 think that every tribe has expressed during my
10 tenure, as well as you today, especially when
11 we had the listening conference in Mobile last
12 year, last July. You had just come on board at
13 that time. And your associate was chairing the
14 meeting at that time while you were going
15 through your process of the appointment to
16 chair. And I think that if nothing else what
17 was really expressed about that belief -- I
18 want to reiterate what was said -- you said at
19 the conference back in July that the
20 communication was very vital between the
21 federal government and the tribal governments
22 in terms of the government-to-government
23 relationship. I think we offered that over the
24 years. Also, maintaining the business
25 relationship which the NIGC has created, which

1 is a whole different animal in which tribes
2 were used to working with, and so for the past
3 20 years now or 23 years, which we are now
4 calling protecting the industry is something
5 that is still new in to Indian country, even
6 after 20 some odd years, being involved in
7 gaming.

8 So it's something that I think -- it is a
9 partnership with the federal government and
10 you're the lead agency for the government's
11 side, federal government side, as well as those
12 that are entering into the gaming industry.

13 And so with that thought, the sovereignty
14 was the main issue which was created. As a
15 result of that laws were passed that stabilized
16 as to how gaming could be operated on Indian
17 reservations, and that the role of the
18 commission at that time was to establish
19 standards in which the tribal government are
20 the ones that decide whether they are going to
21 have gaming or not, and how it's going to be
22 played on your respective reservation or lands.

23 So I think, if nothing else, I think I
24 heard that several times today directly where
25 talking around is that communications, the most

1 vital thing would be the two sovereigns here.
2 Whether it is the United States Government or
3 the Tribal Government.

4 I just wanted to remind everyone that, you
5 know, in order to accomplish what we are
6 looking at today and reviewing some of the old
7 standards that was established by the first
8 commission was part of, responsible for. So if
9 there is something in there that you guys want
10 to talk to me about privately. I do believe
11 that needs to be the major dialogue as far as
12 whether you have future hearings or future
13 discussions with tribal leadership. I think
14 that the tribes also have to play a role in
15 that in terms of who they designate as far as
16 their spokesperson, but also at the same time
17 reminding you that the tribal leadership still
18 makes decisions. They're the ones that have to
19 live with the consequences of their decision in
20 terms of whether -- how the business is run or
21 not. Some of the issues, like Jess just
22 brought up, in terms of still doing things that
23 are not electronically or electronically
24 possible today. And so I am a big proponent of
25 new technologies as well. I will support that,

1 the communications and understanding of
2 operations, whether it is a business or just
3 line of communication. But I do know and still
4 remember those comments of some of the tribal
5 leaders that stated, you know, we can't afford
6 to do this or provide us equipment. We can
7 still do it manually and still be able to get
8 the information that is vital to the
9 reviewing -- making sure that the standards are
10 in place, for the purpose of entertainment and
11 economic development.

12 Thank you. Congratulations on your
13 leadership. And I know it's pretty tough
14 coming from the tribal side to be a federal
15 regulator, but at that time we were not
16 regulators. So we are into the 21st Century,
17 and I am still dragging my feet back in the
18 20th Century, but I am still here. But if
19 there is anything that helps, I am always
20 willing to do so, or as Mr. Cypress indicated,
21 that if there is anything I can do to help the
22 process. Thank you.

23 CHAIRWOMAN TRACIE STEVENS: Thank you,
24 sir, for your comments. Thank you for your
25 time services as commissioner laying the ground

1 work for us to do our work today.

2 Let's take a break. Let's get some
3 nourishment and make all those phone calls our
4 cell phones are buzzing about right now. We
5 will come back at 1:30.

6 (a recess was taken.)

7 CHAIRWOMAN TRACIE STEVENS: I think we
8 might have all said what we are compelled to
9 say today. Let's get started.

10 So returning from lunch, I want to reopen
11 the floor. If there is any other comments, any
12 questions? Do we need to the clarify anything?

13 I do want to turn the microphone over to
14 Dan for a little bit and see if there is
15 anything he would like to say. He was giving
16 me a hard time at lunch that he wasn't given a
17 chance to talk.

18 Any issues that didn't come up already? I
19 understand the tribes are really just listening
20 at this time.

21 MR. BLUEDOG: Tracy, you're probably
22 getting warn down from an eight-city tour.
23 Just kind of wondering, though, you have had
24 many opportunities to listen to tribal concerns
25 from across the country, from a wide array of

1 establishments and travel entities. And maybe
2 you can't answer this question, but are you
3 leaning -- are you looking at regs? You have a
4 pretty thorough look. You have been in office
5 for over six months. Some other folks have
6 been here longer. Are you looking at any
7 particular regs in terms of which you ones you
8 want to move on first or do you have any
9 inclination which direction you want to take
10 this regulatory review and follow up?

11 CHAIRWOMAN TRACIE STEVENS: Thank you for
12 the question. Really, the purpose of these
13 meetings is to let -- to have tribes tell us
14 what regs needs to come first. And, Lael, if
15 you do not mind, I will have Lael address what
16 we are hearing, not necessarily that it's our
17 priority of what we are hearing in these eight
18 places that we have gone and what we are seeing
19 in comments that are being submitted as the
20 priority, because that is what will drive us,
21 is what the tribes are saying. So I will let
22 Lael comment on that.

23 LAEL ECHO-HAWK: I think we have heard --
24 I mean, MICS is obviously a hot topic. Class
25 II and Class III technical standards. Those

1 are big issues. Licensing regulations, also we
2 hear about every single time. The ticketing
3 system for late fees submitted, that has also
4 been a concern. Pre-compliance enforcement
5 proceedings, management contracts,
6 clarification on that, it's all proprietary
7 interest. There has been a lot of concern
8 about that particular issue. These are issues
9 that the Tribal Advisory Committee formats.
10 These are issues that come up, self-regulation
11 is also a concern. Those are sort of the hot
12 issues. There is some lower, sort of, hanging
13 fruit, like changing the calendar year, to a
14 formula based on calendar year based to fiscal
15 year. Makes a lot of sense. Maybe some of
16 those kinds of things that they might not get
17 all the press, but they certainly are
18 important.

19 If we can get some of those smaller
20 things, you know, smaller, but not less
21 important things done, then hopefully we can do
22 that.

23 I don't know if you guys think I am a
24 little crazy. I plan on moving as fast and
25 hard as I can. I hope that people go along

1 with that. However we do it in multiple
2 tracks, if we are doing it in kind of in a
3 series, we will do it as fast as we can, as
4 well as we can, so that by the time our time is
5 up we will have done the best we can. Those
6 are the issues that percolated to the top as
7 the most important, but they're also large
8 substantial issues.

9 So I anticipated a time frame from those
10 to be a little longer. We are just going to
11 move as fast as we can in order of priority,
12 but also trying to get as much done as
13 possible. That means addressing some of the
14 smaller issues first and sort of concurrent
15 with the bigger issues. That hopefully is
16 something that we can do.

17 COMMISSIONER DAN ROSE: End of the session
18 I would like to address the appreciation from
19 the chair to the Commission for conducting
20 these consultations. I would like to remind
21 you we all have functioning commissions now in
22 place. I would caution as you go forward, if
23 it ain't broke, don't fix it. Because it winds
24 up in our hands and we have to change our
25 processes and accommodate it.

1 We are looking for a big change and we
2 hope you will keep us involved in terms of the
3 MICS.

4 CHAIRWOMAN TRACIE STEVENS: To be aware,
5 that we should be cognizant of the effects, any
6 change that we make will have on tribes on the
7 regulatory bodies and coming in compliance
8 with, even if they are modified or streamlined
9 modifications, they are still the impact of
10 making that change on all tribes. And we will,
11 as we move forward in revisions, continue to
12 ask tribes as we are making those revisions how
13 does this effect you when we make these
14 changes? What are the costs to you? Is this
15 feasible? Is it possible, because you're the
16 one on the ground every day. And you are
17 better able to answer for your tribe or your
18 operations or your regulatory body, your
19 ability to comply even with what would be not
20 necessarily more regulations, but as Judy was
21 saying, better regulations. There is still
22 cost involved. There is resources involved to
23 come into compliance with the changes, and we
24 will be aware of that. We will continue to
25 remind ourselves and ask tribes what that might

1 be for them.

2 So that is a good reminder to us as we
3 move forward to always ask that question. We
4 don't want to inadvertently, what might sound
5 good to us, inadvertently be problematic for
6 the tribes.

7 Do we have any other comments? If not, I
8 might be inclined to -- we are moving. I have
9 to keep an eye on Jess.

10 JESS GREEN: I will visit with you
11 privately.

12 CHAIRWOMAN TRACIE STEVENS: If there are
13 no other questions, we do have a good
14 announcement to make.

15 We have been talking and we have been
16 asked about, in these preferences, hiring a
17 agency, and we have adopted an Indian
18 preference in hiring policy for the agency,
19 just so you all know.

20 We have talked about it. We had to sort
21 of iron it out and make sure that it was
22 appropriate for our purposes. This was applied
23 to the agency as their new agencies that open
24 up for promotions. We believe that, similar to
25 other agencies, like an Indian Health, BIA, BIE

1 that we serve just Indian Country -- to be able
2 to work on with tribes in those situations. So
3 that is going forward. It is not going back.
4 It is moving forward.

5 Just wanted to let you all know that we
6 have done that. We have been talking about it.
7 Now it is done.

8 Did you have anything, Lael?

9 LAEL ECHO-HAWK: As you formulate your
10 comments and send them to us, because there are
11 so many issues that were percolated up, one of
12 the key things, I think, is going to be the
13 process.

14 I am a big fan of what we have done over
15 the past eight consultations since November,
16 which is the Notice of Inquiry, I think the
17 process has been good.

18 I remember sitting on the other side of
19 the table and not being that thrilled of the
20 process, the complications, sat in front of it
21 and whined about the process. I never felt it
22 was that great. We literally had people come
23 up to us and say it was great, the meeting was
24 perfect, which shocks me because I certainly
25 would never have said that on the other side.

1 We do appreciate the tone that the tribes are
2 taking with us and I appreciate everyone's
3 goodwill in trying to do a good job.

4 In moving forward we hope for the same to
5 be true. When we think about what process, it
6 doesn't have to -- I don't think one -- we can
7 be really innovated. We can go about these
8 revisions in a number of different ways. So if
9 certain ways are -- if the Tribal Advisory
10 Committee is more appropriate or negotiating
11 role making process is more appropriate in time
12 for written comments is okay for another, then
13 please let us know that. We don't want to be
14 guessing. We don't want to go about it, you
15 know, in a way that tribes are not comfortable
16 with. At the same time, we have such a small
17 window. So we need to figure out a way to do
18 this and make the process move along in a good
19 way, and while accomplishing this massive
20 undertaking.

21 So please consider that. That is one of
22 the keys to how we are going to be able to get
23 this done. We need your input.

24 CHAIRWOMAN TRACIE STEVENS: With that, all
25 the volunteers for the comments, I do encourage

1 you to submit in writing written comments to
2 us. If you have questions, please contact us.

3 This concludes our road trip. I was
4 thinking about getting one of those rock
5 T-shirts, and having all the cities listed.
6 But I want to emphasize, this is just the
7 beginning of a new way for the NIGC to
8 communicate with tribes.

9 I think, Max, you said something to me in
10 the hallway about, you know, you talk first,
11 and I don't remember exactly, but you can go
12 ahead and say it.

13 MAX OSCEOLA: Talking about this in the
14 beginning, keeping it going is progress. But
15 working together is a success.

16 CHAIRWOMAN TRACIE STEVENS: That is a good
17 model to remind us of what we are doing.

18 There is going to be many more steps that
19 follow this. When we effect, you know -- their
20 policies were tribal implications. Our
21 responsibility is to work with tribes, come up
22 with solutions, and have tribes tell us how it
23 affects them, also show us the way on how to
24 solve issues.

25 So this is one of many more steps to come

1 in the future that you will be at the table
2 with us, not just telling us what your concerns
3 are -- I keep emphasizing that -- but you all
4 have to help with me with solutions too,
5 especially in the face of differences.

6 With that, I don't know if, Max, if there
7 is anything you want to say on behalf of the
8 Seminole Tribe before we close.

9 MAX OSCEOLA: I would like to thank you
10 for this consultation. To me, it's real.
11 You're all speaking from your heart. And in
12 the end, we are all here to make sure the tribe
13 runs efficient. You have your
14 responsibilities. We do too as the tribal
15 members.

16 Thank you for all the tribes that have
17 come in to hear, because the only way that evil
18 can succeed is for good to do nothing.

19 CHAIRWOMAN TRACIE STEVENS: I wish you
20 safe travels home. I appreciate that you had
21 to manage your travel around inclement weather.
22 Be sure you're travelling safe home.

23 My hands up to the Seminole Tribe of
24 Florida for your gracious hospitality here. I
25 look forward to everyone's contact. Please do

1 contact us for anything, not just about what we
2 are doing here, but anything that you might
3 need or any questions you might have.

4 The premise that we operate under as
5 we move forward, we are here to help, we are
6 here to assist, we are here to partner and we
7 are going to do this collaboratively on
8 everything.

9 So, Dan, anything you would like to say?

10 COMMISSIONER DANIEL LITTLE: I too would
11 like to obviously thank the Seminole Tribe for
12 their hospitality.

13 I also want to thank our staff who did all
14 the work and logistics in putting this thing
15 together. Thank you. And please have safe
16 travels home.

17 CHAIRWOMAN TRACIE STEVENS: With that,
18 that concludes this meeting and wish you all
19 well. Thank you very much for attending.

20 (Proceedings concluded at 2:00 p.m.)

21

22

23

24

25

CERTIFICATE

STATE OF FLORIDA)

COUNTY OF DADE)

I, the undersigned authority, hereby
certify that the foregoing transcript, page 1
through 99 is a true and correct transcription of my
stenographic notes, taken before me at the time and
place set forth on the title page hereof, that the
foregoing proceedings were reported
stenographically by me and later transcribed into
typewriting under my direction; that the foregoing
is a true record of the proceedings taken at that
time.

IN WITNESS WHEREOF I hereunto set
my hand and affix official seal this 15th day of
February, 2011.

RANDI GARCIA, COURT REPORTER, RPR
NOTARY PUBLIC

1	5		
1 1:10 101:5	518 63:24 64:2 65:7	accountants 3:5	adopted 49:1 95:17
10 61:24	65:9,24	accounting 3:4 12:2	advance 67:4
100 59:20	556 77:2	83:12,13	advantage 46:6
11 22:13	558 77:2	accurate 83:19	advisory 21:24
11:00 70:16	559 66:20	achieve 64:14	30:15,17 45:21
12 23:8		achieved 68:6	46:11 47:10 66:3,8
120 17:15	7	acknowledge 56:8	66:16 73:9 78:10,12
12th 23:1	75 75:21	56:16 58:3,16 59:8	78:15,20,21,22
13175 19:13	77 4:8	59:10,23 60:1	79:16 80:11,24 92:9
15 8:16 70:15	8	act 4:16,20,21 18:14	97:9
15th 101:15	80 75:20	19:7 31:9 33:5,19	affairs 54:25
16 36:15	9	47:5 50:6,18 51:5	affect 8:2
17 71:24	96 38:19	52:10	affix 101:15
18 15:6 21:15,16	99 101:6	action 46:2 54:3	afford 89:5
36:14	9:21 1:11	62:8	aftermath 74:9
184 59:5	a	actions 62:3,5	agencies 18:23
18th 22:23 85:9	a.m. 1:11	active 85:14	20:21,23 21:14 30:7
1977 3:18	ability 73:8,12	activity 4:4,22,24	49:17 50:20,25 53:1
1993 40:5	94:19	14:6	54:12,14 55:4 58:17
19th 85:9	able 7:4 9:21 40:14	add 81:20 83:12	69:21,24 95:23,25
1:30 90:5	40:16 47:22 49:17	adding 44:6	agency 11:15,19
2	66:9 69:10 70:9	addition 83:11	12:9,15 13:10 14:11
20 83:17,23 87:3,6	82:12 89:7 94:17	additional 63:6	20:8 22:16 27:7
2011 1:12 101:16	96:1 97:22	additionally 18:21	29:3 30:17 33:9,9
20th 85:9,9 89:18	absolutely 63:6	19:5	33:13,16,18 34:24
21st 39:5 69:9,16	65:14	address 8:23 18:8	49:1 75:19 87:10
72:2 89:16	access 28:12 29:7,7	21:5 27:4,5,19	95:17,18,23
23 87:3	29:11,13,14 38:20	40:21 44:16 46:23	agenda 10:1 14:6
233 49:2	85:25	51:3 77:20 91:15	18:6 19:8,10 35:24
24 60:23	accessible 23:16	93:18	36:11 51:11
2:00 100:20	accommodate 93:25	addressed 14:8	agendas 76:9
3	accompanied 35:24	21:23 26:11 27:25	aggressive 69:20
3 1:12	accomplish 88:5	56:9	agnes 2:24
3c2 34:22	accomplished 47:15	addresses 55:13	ago 50:9 71:23 77:5
3c3 20:5	78:24 84:14	addressing 12:22	agree 13:22 63:7,25
4	accomplishing	13:17 74:8,13 93:13	65:13 66:4 69:11
4,000 68:10	97:19	adequately 46:23	70:9 72:12 73:17
40 17:16	account 82:11	administration	77:25
45 8:16	accountability	12:23 50:22,24 53:6	agreed 18:18
	23:13	administrations	agreement 41:8 81:5
	accountable 36:3	52:22	84:23
	37:22	administratively	agreements 44:2
		52:25	ahead 2:21,23 63:18
		administrator 42:17	98:12
		42:24 48:21	

ahold 39:2 ain't 93:23 air 26:21,22 65:14 aired 8:25 alabama 44:25 alan 2:24 alleviate 46:3 allocate 75:19 allocating 44:8 allow 28:12 83:21 allowed 59:22 allowing 5:13 17:13 40:2 altimus 6:7 28:5 40:7 ambitious 43:5 47:13 american 3:15 amount 25:16 84:9 analogize 41:13 analyses 41:13 analysis 64:12 animal 87:1 announce 62:19 announcement 22:25 95:14 announcements 32:3 answer 40:12 47:23 55:17 91:2 94:17 answers 52:17 61:17 anticipate 53:9 anticipated 11:17 93:9 anticipation 72:20 apologize 38:18 39:1 47:17 appeal 26:9,16 appear 31:7 appeared 53:19 application 48:11 77:14 applied 41:18 95:22 appointed 60:20	appointment 86:15 appreciate 6:3,22 7:5 41:9 43:25 56:2 56:6 58:15 62:9 68:23 69:3 70:6 79:14 97:1,2 99:20 appreciation 93:18 appreciative 40:13 approach 63:16 66:21 68:23 approaching 61:23 appropriate 56:19 66:18 95:22 97:10 97:11 appropriately 56:16 74:9 appropriateness 63:8 approve 53:2 approved 73:9 approximately 36:14 april 19:9 36:12,15 57:25 58:25 area 2:17 8:21 17:2 45:1 64:20 areas 7:18 9:9 42:2 52:14 64:23 76:6 arguments 82:7,12 arrange 7:1 array 90:25 arrive 2:16 asked 24:15 36:6 39:24 41:4 47:18,19 47:21,24 63:2 70:22 95:16 asking 10:21 13:12 22:3 assembled 66:15 assembly 8:16 assert 57:20 58:10 assess 47:8 assimilate 73:13 assist 100:6	assistance 10:5 14:11 21:20 75:4,17 76:7,13,15 assistant 2:24 10:14 associate 6:15 11:24 14:20,24 86:4,13 associated 73:14 75:24 association 33:6,21 56:10,13 assurances 55:10 attained 64:16 attaining 47:13 attending 100:19 attention 7:18 9:10 12:11 13:18 20:5 attorney 26:8 63:1 85:21 attorneys 3:1 85:15 audits 83:5,8 authorities 51:6 60:14 authority 27:8,14 29:13,17 43:23 49:16 50:3,15 52:4 56:17 74:21 101:4 avail 8:22 available 8:23 40:11 61:11 avenue 85:24 avoid 30:4 aware 71:8 72:7 94:4,24	77:14 85:22,25 backgrounds 68:7 bad 50:14 74:19 banks 41:19,22 barely 83:11 based 23:19 43:16 43:18 76:12 92:14 92:14 basically 7:19 10:21 11:17 basis 11:13 46:4 82:11 bc 4:23 bear 73:1 beautiful 5:17 beauty 84:20 beginning 7:10,16 9:8 10:1 14:4 31:7 62:7 98:7,14 behalf 39:25 42:22 43:1 56:12 59:5 70:23 99:7 belief 86:17 beliefs 43:8 believe 7:18 44:4 46:11 63:21 65:21 66:3 88:10 95:24 beneficial 77:5 79:1 80:22 beneficiary 31:16 benefit 25:24,24 43:11 47:7 64:11,18 benefits 75:23 best 12:4 20:16 21:5 21:11 22:6,7 36:21 40:17 51:20 52:13 56:18 57:9,13 61:1 66:20 73:8 76:3 93:5 better 13:10 18:13 33:3 45:15 71:14,22 72:9 73:22,23,24 75:6 78:21 79:11 94:17,21
--	--	---	--

beyond 43:24 64:17 bia 4:9 95:25 bie 95:25 big 4:14 12:8 59:19 69:19 80:14 82:4 88:24 92:1 94:1 96:14 bigger 93:15 binding 33:19 bingo 3:18,18 bit 11:1 48:25 54:18 54:22 90:14 black 48:14 bless 59:16 bluedog 49:12,12 52:19 56:8 90:21 board 56:9 75:25 86:12 bodies 94:7 body 94:18 bog 78:18 81:5 bogged 80:20 born 5:4 borrow 35:10 boss 56:3 bottom 86:8 branch 50:25 break 62:21,23 70:13 81:6,23 85:4 90:2 brief 37:23 52:19 56:11 briefly 12:19 16:7 16:18 17:18 24:5 bring 11:10 22:16 57:23 73:14 76:25 78:23 bringing 53:13 73:1 79:14 brings 22:7 broad 8:1 broadly 53:24 broke 38:15,17 93:23	brought 15:19 85:20 85:21 88:22 broward 3:21 4:6 bryan 42:18 47:17 budget 52:24 75:20 76:1 building 7:22 10:1 14:6 built 82:5 bulletin 24:10 bulletins 52:13 74:16 78:5 bumping 50:8 bunch 35:13 burden 25:22,25 burdensome 46:12 64:11 77:11 burning 85:5 busier 16:23 business 4:14 41:24 86:24 88:20 89:2 busy 16:23 butter 4:7 butterworth 4:5 button 19:17,24 buy 33:5,8,16 buzzing 90:4	carefully 35:23 case 41:12,12 79:5 cases 41:13,14 cash 44:8 catalog 11:3 caught 13:14 cause 54:17 82:7 causing 54:16 caution 61:22 62:9 84:19 93:22 caved 2:13 cedric 39:10,10 cell 90:4 central 2:10 century 39:5 69:9 69:17 72:2 85:9,9 89:16,18 certain 21:1 35:25 36:5 42:1 83:13 97:9 certainly 8:12 33:3 49:4 63:15 65:1 92:17 96:24 certificate 25:23 101:1 certified 49:2 certify 101:5 cetera 26:16 cfo 25:12 chair 29:16 53:21 60:4 86:16 93:19 chairing 86:13 chairman 2:3,5 5:8 15:4 26:20 37:12 39:9,23,25 55:23,24 60:6 62:14,15,16 chairwoman 2:1 5:7 5:10 15:9 16:3 17:11,14 21:10 22:24 29:16 37:14 39:20 42:13,18 48:18,22 50:17 53:12 55:25 60:5 62:19,25 69:2 70:18 75:1 76:23 79:13	82:14 84:16 89:23 90:7 91:11 94:4 95:12 97:24 98:16 99:19 100:17 challenge 13:21 69:16 79:15 chance 9:5 48:7 90:17 change 8:13 28:17 93:24 94:1,6,10 changed 68:8 changes 2:11 7:23 20:17 21:3 25:11 43:10 45:1,3 76:20 94:14,23 changing 24:16 92:13 chat 14:25 check 81:1 83:20 checking 54:14 checks 85:22 cheyenne 70:23,25 74:3 76:18 chief 6:13 11:23 59:11 60:21 children 44:21 chill 17:16 chitimacha 39:22 cindy 6:7 40:7 67:15 67:21 cities 79:19 98:5 city 15:5 17:17 25:12 59:19 90:22 clarification 74:23 92:6 clarifications 82:24 clarify 90:12 class 27:4,4,8,10,13 27:16 44:25 45:1,4 45:16 49:24 50:11 71:12,19 72:3,4,8 73:5 74:13 79:17,20 80:10 91:24,25 classic 3:19
---	--	---	--

clear 13:23 46:6 50:24 57:14 74:10 74:22 77:9 79:19,22 clearer 48:4 click 19:24 close 20:5 99:8 closed 11:5 35:11 closely 46:13 47:2 47:11 closes 22:25 closing 58:12 59:10 codes 16:13 coffee 70:14 cognizant 30:2 94:5 coincidence 59:12 collaboration 56:20 collaboratively 100:7 colorado 27:6 52:15 columbus 4:23 combination 31:5 47:9 come 3:22 5:13 6:19 7:17,19,19 8:20 15:21 16:11,21,25 19:9 24:14 26:15 30:3,10 31:4 35:7 36:20 37:5 38:22 51:10 55:15 60:16 62:3,24 69:9,19 70:15,19 72:5 80:15 80:18 86:12 90:5,18 91:14 92:10 94:23 96:22 98:21,25 99:17 comes 12:23 51:7 comfortable 97:15 coming 6:22 53:21 54:23 61:18 72:20 89:14 94:7 commencing 1:11 commend 63:15 comment 28:25 34:7 35:21 39:7,16 43:3 47:11 53:3,4 62:23	83:1 91:22 commentary 22:25 35:11 comments 14:21 22:3,7 23:5,5,8,19 34:1,2,9,17 35:14 35:15 37:13 38:4,10 42:5,7,14 48:16,19 48:20 49:10,25 62:17,20 63:3,7,23 63:25 66:5 67:9 69:4 70:6 84:17 85:1 89:4,24 90:11 91:19 95:7 96:10 97:12,25 98:1 commission 1:1 5:11 6:1 7:17 15:17 18:15,18 19:11 20:2 20:4 26:7,15 32:15 32:21 33:24 40:4 42:24 43:11,14,23 44:1 45:18,25 46:4 46:16,19,21 47:1,4 47:10,12 48:12,14 50:2 51:4 52:1 53:19 56:15 58:4 63:9,12,16,17,21 64:7 65:8,18,25 66:7,21 67:2 68:3 68:23,25 72:21 75:13 83:2,6 85:8 85:11,17 87:18 88:8 93:19 commission's 43:3,6 44:15 57:1 64:1,22 commissioner 5:21 6:15 11:25 14:20,24 15:1,11 23:20 89:25 93:17 100:10 commissioners 5:20 15:20 40:7 47:8 60:11,18 86:4 commissions 93:21 commitment 35:20 35:21 58:5 72:17	committed 12:14 19:15 20:2 23:13,22 committee 30:15 42:25 45:22 46:11 66:4,17 73:9 78:20 78:21,22 80:12,13 92:9 97:10 committees 21:24 30:17,22,23 66:8 78:10,13,16 79:8,16 80:11,24 communicate 31:22 98:8 communicating 20:24 communication 31:20 40:12 59:7 86:20 89:3 communications 87:25 89:1 communities 22:20 59:24 community 73:12 73:14 community's 61:12 compact 27:13 71:9 71:11 compactness 71:7 company 29:9 compelled 90:8 complete 65:8 completed 36:11 completely 82:19 compliance 11:12 30:3 92:4 94:7,23 complicated 74:18 complications 96:20 complies 75:12 compliment 39:11 comply 29:23 94:19 concentration 72:17 concept 70:9 84:13 concern 27:3 31:10 46:18 48:23 78:1 92:4,7,11	concerned 11:18 31:21 concerns 8:24 14:23 18:5 24:8,10 27:23 29:1 31:18 65:13 77:20 90:24 99:2 concluded 100:20 concludes 98:3 100:18 concurrent 93:14 conditions 42:1 conducted 30:25 conducting 93:19 confer 40:17 conference 8:21 40:2 86:11,19 conferences 7:14 24:3 40:15 confusing 32:16 confusion 74:19 congratulations 89:12 congress 4:11 46:14 connection 41:2 consequences 88:19 consider 11:7 26:18 28:10 30:7 34:14 35:23 44:8 79:12 97:21 considerations 44:10 considering 33:19 36:9 46:22 considers 45:18 consistent 51:1 57:3 consortium 58:2 constituents 20:24 consult 7:23 20:10 21:16 consultation 1:2 7:7 7:21 9:2 12:17 14:4 14:11 19:13,22 23:6 23:7 29:3 32:10 39:12 73:25 99:10
--	--	---	--

consultations 9:13 22:14 24:1 30:6 31:23 36:23 43:10 48:24 93:20 96:15 consulting 73:22 contact 17:21 18:4 32:12 98:2 99:25 100:1 contemplated 43:11 context 27:12 74:1 contextual 82:11 continue 21:12 22:19 45:10 51:24 57:20 73:4 83:18,22 94:11,24 continuing 66:15 contract 31:5 43:15 43:16,19 contracts 24:13,14 26:2,3 31:6 43:21 92:5 contrary 64:13 control 80:17 controversial 30:18 49:25 cooler 2:11 cooperative 40:9 coopted 67:2 coordination 19:13 copy 17:22 37:9 correct 76:17 101:6 cost 64:11 76:1 94:22 costs 75:23,24 94:14 counsel 3:12 6:12 17:11 32:14 39:22 41:10 59:11 counsel's 32:19 count 83:17,18 country 5:5 8:2 22:8 22:18 26:24 27:24 30:19 33:14,19 35:6 36:22 43:12 45:13 47:2 57:18 59:25 60:22 63:11 65:2	68:14 73:1 87:5 90:25 96:1 country's 73:2,3 county 3:21 4:6 101:3 couple 15:8 18:1 23:10 30:16 77:1 course 40:3 41:24 54:21 57:23 74:4 courses 54:8 court 3:25 101:19 courtesy 55:9 coverage 80:3 covered 39:18 craft 45:22 crafted 46:12 crazy 92:24 created 85:11 86:25 87:14 creating 54:15 55:11 85:12,24 creek 42:23 44:24 crit 74:9 criteria 42:3 48:1,4 48:9 77:4 critical 46:25 66:8 cromwell 39:9,10,10 cross 75:15 crosshairs 55:5,22 culturally 9:17 culture 59:21 cure 29:23 curious 49:15 50:1 50:15 53:11 current 30:11 56:25 currently 77:21 cusps 14:5 cut 4:12,15 cypress 2:3,5 5:8 15:4 62:15,16 89:20	daily 46:4,7 dakota 38:19 71:5,7 dakotas 83:10 dallas 80:21 dan 6:15 11:25 14:20 60:7 90:14 93:17 100:9 daniel 15:1 42:22 45:6 76:23 100:10 darden 39:23 data 79:7 database 28:14 68:16 day 7:24 11:13,13 35:17 45:9 94:16 101:15 days 25:14 60:24 dc 5:1 6:6 8:20 22:17,21 23:12 deal 7:11 27:1,9 53:5 56:15 65:12,15 67:24 dealing 25:20 31:5 40:4 49:7 december 3:17 decide 66:7 87:20 decides 47:4 decision 13:24 36:7 40:25 48:12,13 52:16 63:12 80:18 88:19 decisions 15:13 44:13,18,22 58:8 61:8,9 88:18 dedicated 19:22 defective 73:21 defer 34:25 35:3 deference 45:18 defines 31:12 definitely 31:18 definition 43:14 44:7 definitions 24:8,22 49:24 50:12	degree 17:15 demographics 9:18 demonstrates 63:10 demonstration 7:22 department 24:19 49:21,22 50:9,11 54:8,21,25 80:16 depending 65:21 deputy 60:21 designate 38:8 88:15 desire 57:16 80:1 85:5 detail 77:23 detailing 47:6 determinations 41:22 determined 55:8 determining 20:9 77:17 develop 40:15 45:14 developed 42:4 72:16 developing 81:22 84:25 85:15 development 89:11 devise 52:20 dialogue 8:3,7 56:19 57:4,13 58:1 59:7 88:11 difference 17:15 differences 9:14 99:5 different 9:15,16,16 9:17,18,19,19 10:23 27:1,17 65:23 66:17 78:17 79:3,6,7,8,18 87:1 97:8 differentiation 74:6 difficult 41:8 dinosaurs 85:7 direction 35:25 36:5 36:6,13 39:13 78:3 91:9 101:11
	d		
	d.c. 4:17 dade 101:3		

directive 18:22 54:12 directly 87:24 director 6:9 disagree 13:23 36:5 44:6 disagreement 84:24 disagreements 81:24 disapprove 53:3 discourage 43:13 discuss 9:2 discussed 8:7 46:20 85:19 discusses 45:3 discussing 3:9 45:10 86:5 discussion 9:6 51:18 51:19 discussions 6:25 7:12,14 15:18,19 67:15 88:13 distribution 52:25 district 40:9 diverse 81:1 diversities 80:2 divide 79:20 doable 82:19 document 41:7 doi 55:15 doing 10:12 11:10 11:14,23 13:2 16:4 16:15 19:4 20:12,13 22:6,19 30:7 35:10 37:17,20,21 39:11 47:6 72:19,23 77:3 83:16,18 88:22 93:2 98:17 100:2 doors 84:5,10,10 double 83:20 dragging 89:17 drive 91:20 due 19:18 26:14 44:14	duplicate 69:25 e e 10:20 18:7 38:18 39:3 earlier 6:6 64:1 65:11 77:7 82:2 early 80:23 85:3 easier 24:21 70:1 83:5 eastern 6:9 easy 83:8 eat 81:14 echo 6:14 16:9 17:9 17:10 28:6 42:6,9 91:23 96:9 economic 89:11 ed 3:1 63:2 effect 94:13 98:19 effective 33:4 effects 94:5 efficient 12:3 19:1 99:13 effort 45:14 58:16 59:3 efforts 62:11 72:7 eight 9:13 22:14,14 56:14 61:24 71:17 90:22 91:17 96:15 eighth 6:17,23 either 55:21,22 elaine 40:10 elders 15:3 38:7 59:24 elected 32:11 election 21:13 electronic 83:13,20 electronically 88:23 88:23 element 84:19 embracing 71:1 emphasize 23:21 98:6 emphasizing 99:3	employees 28:16 enacted 46:14 encourage 97:25 encouraged 57:5 endless 46:24 energies 57:10 energy 58:3 60:1 enforce 27:8,14 enforcement 6:10 29:20 54:2 79:21 92:4 engage 32:9 57:3 enormity 46:18 enormously 40:9 ensure 44:2 55:10 entering 87:12 entertainment 89:10 entire 83:14 entities 91:1 environment 80:23 envisioned 46:10 equipment 89:6 especially 8:9 41:18 43:4 52:14,15 85:16 86:10 99:5 essential 84:3 establish 20:9 34:25 87:18 established 88:7 establishing 66:16 establishment 85:23 establishments 91:1 et 26:16 everybody 2:6 everyone's 70:1 79:11 97:2 99:25 evil 99:17 exactly 46:9 98:11 examine 11:8 55:19 example 5:15 29:8 33:10,20 65:23 79:16 examples 34:15	excellent 40:14,20 exchange 8:8 excited 57:5,18 58:21 executive 5:25 19:6 19:12,14,23 20:3 34:21 50:25 exempt 41:21 exemption 42:3 exercise 54:24 exist 73:4 existing 51:15 exists 51:23 75:12 expand 43:23 expanding 43:14 expect 8:24 69:20 expected 9:15 experience 16:13 43:20 experienced 46:4 expertise 66:14 experts 45:12 explain 36:7 37:19 express 32:6 expressed 86:9,17 extend 5:11 6:21 extent 50:15 55:19 externally 12:13 eye 71:10 95:9 f fac 49:17 face 99:5 faced 79:15 facilitator 30:25 facilitators 80:14,24 facilities 44:25 66:25 facility 5:15,17 10:17 28:22 29:10 66:19,22 73:18 fact 45:9 59:4 failed 56:16 fair 78:11
--	---	---	---

fairness 78:13 familiar 19:12 families 57:10,13 family 59:8 fan 69:19 80:14 96:14 fans 60:8 far 64:17 86:3 88:11 88:15 fargo 40:25 fashion 8:17 fast 36:16,17 92:24 93:3,11 favor 83:7 fax 10:19 40:12 faxed 32:6 fbi 28:14,18 85:24 fear 47:14 feasible 94:15 february 1:12 23:1 101:16 federal 16:8 20:9,23 21:14,17 23:24 30:7 32:4 49:16 53:1 58:16 62:4 69:21 86:21 87:9,11 89:14 fee 43:16 feedback 15:12 feel 9:4 43:12 fees 24:17 25:1,13 25:20 92:3 feet 89:17 fell 29:3 felt 30:19 48:16 96:21 fewer 82:7 field 76:4 fight 81:7,24 figure 69:12 78:15 78:20 97:17 figuring 27:18 file 26:9 filing 26:15 filtered 32:21	final 45:22 finally 21:23 33:5 36:11 46:17 finance 24:19 financial 29:9 41:5 41:19,22 84:4 financing 41:2 find 82:6 finding 73:23 fine 3:6 finger 28:13,13 finish 81:9 firm 41:4 first 2:22 7:21 8:11 10:3 14:8 16:22 34:7 37:18 38:6,9 39:25 49:4 53:14 63:24 69:14 78:6 88:7 91:8,14 93:14 98:10 fiscal 24:18 92:14 five 70:15 fix 38:17 39:3 70:5 93:23 fixed 76:1 flawed 64:3 flaws 67:11 flexibility 19:6 80:10 81:10 82:5 flexible 79:24 80:1 81:17 floor 16:20 17:3 37:12 38:5 39:6,8 42:13 49:9 90:11 florida 1:11 2:10 4:2 56:7 99:24 101:2 flow 44:8 flu 42:19 fly 42:20 focus 63:22 focused 76:6 focuses 65:23 focusing 74:24 folks 15:21 38:9 55:3 82:17,22 85:4	91:5 follow 18:1,3 52:19 91:10 98:19 following 33:20 63:23 force 3:22 foregoing 101:5,9 101:11 forever 78:19 form 29:21 31:2 40:12 74:16 formalize 41:16 formalized 30:13 54:13 formalizing 28:11 formally 31:11 format 9:21 14:4 34:9 formats 92:9 former 5:19,21 29:8 forms 67:19 formula 92:14 formulate 20:6 34:23 96:9 forth 59:18 101:8 forum 8:3 84:20 forward 15:25 16:1 17:6 35:4,7 37:5 46:15 47:3 50:3 51:10 57:23 58:19 59:3 60:2 61:14,17 63:17,19 68:24,25 93:22 94:11 95:3 96:3,4 97:4 99:25 100:5 found 20:1 four 7:19 14:2,10,16 frame 13:4 21:11 34:16,17 93:9 framework 18:17 frank 5:20 85:6,7 frankly 64:5,13,18 66:20 69:11 free 54:3	fresh 70:14 friends 32:18 59:18 front 84:4 96:20 frost 2:19 fruit 92:13 fully 83:2 functioning 93:21 fund 33:18 funds 33:12,13 future 44:19,20 60:3 88:12,12 99:1
g			
g2e 22:23 game 2:15 gaming 1:1 3:20 4:10,16,20,21 5:11 5:21 9:18 18:14 22:9 24:11 32:15,22 33:6,21 42:24 43:17 44:8,9 45:1,8,16 56:10,12,23 58:2,13 58:18 60:19 71:3,4 71:12 72:7 74:4 83:6 85:8,10 87:7 87:12,16,21 gander 11:21 garcia 1:13 101:19 general 6:12 40:23 41:10 generally 79:17 getting 11:6 34:2 35:9,18 52:11 90:22 98:4 give 3:16 14:24 23:2 26:13 27:7 37:8 38:5 40:16 67:13 76:18 given 27:9,14 40:25 45:17 51:24 90:16 giving 43:2 90:15 glad 5:1,1,17 86:2 go 2:21,23 12:21 13:7,7,7,7 14:9 16:19 17:18 20:16			

22:6,20 25:19 29:5 29:19 36:6 42:5 44:10 47:12 54:9 55:7 56:1 61:5 64:17 67:20 68:16 72:24 73:8 75:11 76:2 77:23 78:18 83:14 92:25 93:22 97:7,14 98:11 goal 43:5 64:6 81:17 goals 47:13 god 59:16 goes 15:13 33:10 75:14 78:3 going 3:11,21,25 10:2 11:2 12:8 13:20,22 14:14,15 17:2,20 21:3,14,19 22:11 23:2,6 25:12 26:11 34:20 36:2,2 36:7,13,15,20 38:3 38:17,25 39:12 51:20 52:1 55:2 59:24 60:25 61:15 61:16 62:2 63:13 65:2,20 67:13 69:15 70:8,10 71:12,20 72:2,8,18 73:22 74:6,21 77:22 79:5 80:7 81:6 83:1 84:11 86:14 87:20 87:21 93:10 96:3,3 96:12 97:22 98:14 98:18 100:7 good 2:1,6 11:20,21 15:1 16:15 17:9 24:24 34:15 48:7 51:1 56:5 60:9 68:14 70:21 72:23 73:11 74:5,6,10 95:2,5,13 96:17 97:3,18 98:16 99:18 goods 33:14 goodwill 97:3	goose 11:21 gotten 11:1 53:5 govern 5:16 governing 58:14 government 5:4 19:14 32:10,10 51:2 55:16 57:17 86:21 86:22,22 87:9,11,19 88:2,3 government's 87:10 governments 20:22 56:14,17 86:21 gracious 5:14 99:24 graham 4:18,19 grandmother 59:16 59:17,19 grasped 83:3 gratitude 5:12 gray 52:15 great 5:15 19:20,20 35:18 37:8 39:16 42:12 45:18 46:1 62:1 70:3 71:1 80:16 84:12 96:22 96:23 greatly 47:7 green 3:5 82:25 95:10 ground 2:18 60:23 81:4,8 89:25 94:16 group 15:22 45:17 80:18 81:1,2 group's 45:8,20 grow 78:8,9 guess 2:10 4:9 21:11 44:17 50:7 51:4 85:10 guessing 97:14 guidance 34:5 74:10 74:16 guidelines 52:13 guy 39:21,21 42:8 42:12 guys 18:12 22:18 33:2 36:18 77:10	88:9 92:23 h half 13:5,8 25:4 hall 72:18 hallway 98:10 hand 14:19 17:24 83:16,18 101:15 handing 6:6 handle 79:8 hands 44:22 58:24 93:24 99:23 hanging 59:19 92:12 happen 20:17 35:6 53:10 59:12 happening 77:25 85:2 happens 67:23 happy 2:8 4:25 15:7 38:8 hard 1:10 2:14 6:1 58:8 90:16 92:25 harris 6:5 hawk 6:14 16:9 17:9 17:10 28:6 42:6,9 91:23 96:9 heading 16:9 health 57:9 95:25 hear 3:25 8:8 15:9 18:9 20:25 26:5 31:18 34:18,19 42:11 57:20 76:12 76:24 82:16 84:21 92:2 99:17 heard 7:13 22:24 23:3,17 24:7,7,10 24:19,23,23 25:11 25:25 26:4,12,25 28:23 29:19 30:5,13 30:20 34:1 38:19 43:9 48:23 52:9 61:20 87:24 91:23 hearing 9:20 14:13 14:16 15:25 16:2 22:10 67:18 80:9	91:16,17 hearings 88:12 heart 5:2 44:11 99:11 held 1:9 29:8 help 6:4,20 10:11 11:11 18:2 27:18 28:2 33:2 38:1 69:5 77:16 80:18 89:21 99:4 100:5 helpful 34:10,16 40:10 42:4 helping 10:8 61:19 85:16 helps 89:19 hereof 101:8 hereunto 101:14 hesitancy 62:10 hesitant 58:21 59:2 hicks 6:10 high 3:18 highlights 79:23 hinge 49:6 hinges 49:6 hiring 95:16,18 history 3:16 51:24 57:20 59:2 61:24 62:6 hit 2:18 10:15,15,16 hitting 14:3 hold 37:22 68:1,10 71:18 holding 22:14 hollywood 1:11 3:15 homa 5:25 home 99:20,22 100:16 honor 56:6 hope 33:20 36:17 38:21 45:16 56:18 57:15 92:25 94:2 97:4 hopeful 35:5 hopefully 31:24 35:17 45:20 92:21
--	--	---	---

93:15 hoping 23:10 hospitality 15:5 40:2 56:7 99:24 100:12 hosts 5:14 hot 91:24 92:11 hours 60:24 81:6 house 55:18 huff 2:25 human 75:21 hurdle 69:15	important 15:11 21:22 22:19 25:6 26:24 27:24 29:25 33:22 45:2 47:5 57:8 64:25 65:12,15 65:17,19 73:15 82:3 92:18,21 93:7 importantly 70:2 imposing 64:14,16 impossibility 60:13 impossible 60:15 improper 73:20 improve 18:20 71:9 71:11 74:1 improved 67:12 improvement 69:18 73:6 inaction 47:6 inadvertently 55:12 95:4,5 inclement 99:21 inclination 91:9 inclined 95:8 include 37:9 62:12 included 24:4,6 27:12 includes 43:15 including 35:13 70:1 income 84:9 inconsistency 54:15 independence 53:23 54:2 55:9 independent 53:22 indian 1:1 3:20 4:2 4:20,21 18:13 19:14 22:8,18 26:24 27:6 27:24 30:19 33:5,8 33:13,19 34:25 35:6 36:21 43:12 47:2 52:16 54:25 58:13 58:18 59:21 60:19 60:22 63:11 73:1,2 73:2 87:5,16 95:17 95:25 96:1	indicated 89:20 indication 57:2 individual 8:18,19 8:24,25 9:4 40:23 industry 18:20 22:8 24:22 45:12 47:7,12 51:21 52:6,13 54:5 80:4 87:4,12 inform 62:13 information 3:10 17:21 18:4 20:1 23:15 32:8,13,20 33:1 35:13 39:1 67:10,11,22 68:2,5 69:4 73:13 74:15 76:22 77:12,15 89:8 informed 14:14 infrastructure 69:17 initiative 10:3,4 16:10 33:7 55:16 75:17 initiatives 7:20 12:1 37:21 76:14 injunction 3:24 innovated 97:7 input 22:5 28:21 31:19 34:4 97:23 inquiry 6:24 9:7 12:18 16:7,20 17:4 17:19 18:10 20:19 20:20,25 21:6 22:22 23:23 24:6 31:25 37:24 43:4,7 45:3 63:4,9 96:16 insignificant 25:6 inspection 29:7 install 38:16 instance 79:2 instances 22:1 50:13 institutions 41:19 41:23 intended 11:10 41:25 43:24 46:14	intent 18:9 19:16 20:3 interacting 20:21 interest 31:3,9,13 40:25 41:3,17 46:1 61:3 81:4 92:7 interested 28:19 31:17 52:3 interior 49:22 50:21 54:8,21,25 80:16 internal 39:4 69:8 internally 12:12 25:7 internet 38:21 internets 10:19 interpret 51:5 interpretation 51:8 introduce 2:23 3:11 introduced 31:25 introducing 2:21 investigations 28:4 28:9 67:17 investigators 67:16 invite 57:23 58:20 invocation 2:4 involuntary 55:21 involve 55:19 involved 45:7 52:25 55:2,9 62:12 85:12 87:6 94:2,22,22 involvement 46:10 involves 43:20 involving 13:12 iron 95:21 issue 9:22,23 13:17 21:1 25:9,16 26:19 26:19,24 27:6 29:15 30:13 31:4 34:12 40:21 41:5 42:10 44:16 51:3 56:20 64:25 65:10 73:25 74:3 83:1 87:14 92:8 issued 18:22 41:10
i			
idea 19:3 22:15 24:24 40:24 41:21 44:6 45:24 ideas 8:8 42:9 49:4 69:25 84:12,24 identified 34:11,11 identify 7:17 identifying 9:9,10 61:18 idol 3:15 igra 43:24 44:3 46:9 46:15 ii 27:4 44:25 45:1,4 45:16 49:24 50:12 71:12,19 72:3,8 73:5 91:25 iii 27:5,8,10,13,17 72:4 74:14 79:17,20 80:10 91:25 illegal 83:18 immediately 54:23 55:14 impact 30:1 94:9 implement 18:16 20:7 34:23 50:5 60:25 implicate 42:2 implications 20:8 34:24 98:20 imply 47:25			

issues 8:18,25 9:4,10 9:11 15:10,14,22 18:5 21:4,5 23:24 24:7,14 26:3,6 27:2 27:16,23 30:10 31:1 39:24 41:1 49:23 50:20,23 61:19 65:16 68:20 78:14 78:14 85:20 86:1,2 86:3 88:21 90:18 92:1,8,10,12 93:6,8 93:14,15 96:11 98:24 issuing 21:15 25:2 29:24 41:23 52:12	keith 6:9 40:8 key 28:15 96:12 keys 97:22 killed 2:19 kind 4:21 10:21 14:3 18:2 19:1 23:3 31:1 42:3 53:10 79:6 80:23 90:23 93:2 kinds 41:12 92:16 know 2:8 4:9 5:3 6:11 8:3,12 9:3,22 10:9 11:22 12:11,13 12:18 14:17 15:12 16:6,25 18:13,16,22 19:3 21:2,21 22:4 23:16 25:3,3 26:8 26:14 27:20 30:15 31:5,9 32:22 33:3,5 33:20,25 36:12 37:16,23 38:1,12 41:20 44:18,24 47:25 48:5,7,15 49:8 50:4,8,19 51:1 51:4 54:4 55:8,13 57:11 58:12,21 59:1 60:18 61:1,6 62:5 62:22 65:1 68:5,7 68:14 69:22 70:3,4 72:6,6 74:17 75:22 78:7,8,19 79:5,9 80:23,25 84:18 88:5 89:3,5,13 92:20,23 95:19 96:5 97:13,15 98:10,19 99:6 kurt 49:12 56:8	laid 86:1 lands 87:22 large 19:18 58:1 78:16 82:18 93:7 larger 84:11 larry 6:11 59:11 60:20 laryngitis 6:3 lastly 12:16 late 25:1,14,20 59:16 92:3 law 41:4 56:23 85:13,15 laws 87:15 lawyer 53:16 69:13 laying 89:25 lead 19:10,25 32:12 87:10 leader 32:2 38:6 leaders 2:7 15:3,20 16:21 22:5 32:23 38:4,7 57:11,18 58:2 62:1 89:5 leadership 22:9 37:3 38:9 56:22 57:2,8 57:21,24 58:6,24 60:17 88:13,17 89:13 leads 21:23 leaning 91:3 learn 40:17 learning 9:12 13:6 leave 47:5 led 80:5 left 13:6 15:5 48:15 80:7 legal 4:1,2 39:21 41:6,9 68:1 legally 68:6 legs 62:21 70:13 lending 41:7 letter 8:15 letters 32:2 level 21:9 34:13 71:22 80:5	levels 3:24 10:24 license 66:19,22,25 67:10,18 licensing 28:4,22 73:18 77:8 92:1 life 71:4 light 52:15 limitations 66:11 70:3,4 limited 16:24 linda 45:6 line 8:16 35:12,13 68:12 71:18 86:8 89:3 lines 29:18 38:22 75:15 list 64:22 listed 98:5 listen 90:24 listening 84:19,21 85:2 86:11 90:19 literally 96:22 little 3:16 6:15 11:25 14:20,25 15:1 23:20 41:15 47:14 85:3 90:14 92:24 93:10 100:10 live 57:12 88:19 lives 61:6 liz 5:22,22 loans 41:23 local 31:8 location 84:9 locations 22:14 logistics 100:14 long 21:12,18 47:13 56:1 77:4 longer 91:6 93:10 longstanding 56:9 look 8:11 11:2 12:25 16:1 17:5 18:20,24 23:4,17 24:15 26:1 28:20,25 29:6,20 30:9 34:6,9 35:2,8 36:1 46:15 47:19
j			
j 1:12 january 22:13 jenkins 3:1 63:2 67:8,13,14 jess 88:21 95:9,10 jim 2:23 3:4 job 1:25 16:15 55:6 97:3 jobs 10:12 69:5 joe 3:1 72:6 73:17 joel 5:20 john 39:23 judged 62:2 judy 70:20,21,22 75:2,14 76:21 81:19 81:20 82:14 83:9 94:20 july 7:16 86:12,19 justice 49:22 50:9 50:11,21 54:19			
k	l		
keep 14:13,14,16 15:15 22:10 34:1 51:17 59:24 82:3 84:10 94:2 95:9 99:3 keeping 14:18 98:14	ladies 59:20 lael 6:14 12:18 13:19 14:22 15:13 16:9,18 17:8,9,10 28:6 37:15 42:6,9 60:21 91:14,15,22 91:23 96:8,9		

58:19 61:14,17 63:17 68:24 69:12 75:10 76:3 78:4 81:2,22 91:4 99:25 looked 31:6 looking 15:24 21:8 25:8 33:9 38:23 53:15 54:22 55:7,15 65:22 71:4,8,10 80:8 88:6 91:3,6 94:1 looks 21:19 49:10 81:19 lose 16:17 lost 32:24 lot 2:15 6:2 11:16,22 12:10 16:4,12 21:19 31:10 32:23 37:17 46:3 52:9 54:10,10 58:11 67:14 69:6 70:8,11 74:5 77:10 77:11,15,23,23 78:4 78:24 82:1 85:11 86:1 92:7,15 lots 34:1 52:11 louisiana 39:22 love 42:11 lower 3:24 92:12 lucky 32:18 lunch 85:3,4 90:10 90:16 lung 25:13	making 4:13 12:14 20:17 21:25 22:2 36:8 44:12 47:11 52:3 65:5,25 75:15 83:11 89:9 94:10,12 97:11 manage 99:21 management 24:13 24:14 26:2,3 28:15 29:9 41:7,25 43:15 43:20,21 52:24 75:18 83:6 92:5 managing 16:15 mandate 43:22 51:9 mandated 49:3 50:5 50:18 mandates 56:21,22 mandatory 55:20 68:8 manner 57:22 83:22 manually 89:7 manuel 34:7 mark 19:19 35:18 market 71:20,21 marsha 3:5 marty 2:24 massive 97:19 material 75:11 materials 67:3 matter 34:17 59:4 63:6 matters 9:2 mavis 6:4 17:25 19:18,19 23:11 max 3:12,13 98:9,13 99:6,9 mcdonald's 3:2 mcghee 42:17,23 45:6,6 48:21 76:25 mdewakenton 49:13 mean 43:19 50:13 51:21 54:17 62:22 91:24 meaning 48:10	meaningful 72:4 means 11:17 13:11 31:13 69:8 74:8 81:11 93:13 mechanisms 79:17 79:24 80:1 medium 82:18 meet 10:8 75:8 80:2 82:10 meeting 2:2 27:1 33:10 37:20 86:14 96:23 100:18 meetings 8:13,19 9:1,1 24:2 30:25 45:14 80:21 91:13 member 3:12 5:9 17:10 56:10 members 2:24 44:21 73:11 99:15 mentioned 21:10 merely 43:16 met 24:2 method 34:13 mic 67:13 michael 39:21,21 42:8,12 microphone 14:23 36:25 37:25 70:19 82:23 90:13 microphones 38:2 mics 26:21 27:4,9,10 27:13,17 45:5,8 65:10 66:2 71:15 74:14 77:21 78:3,7 79:2,17,21 80:10 82:2 91:24 94:3 mike 3:1 mind 15:15 39:19 55:14 82:3 91:15 minded 54:1 minds 70:1 minimal 71:3 minute 13:20 minutes 8:16 13:8,9 70:15	mistake 73:20 mittell 2:3,5 62:16 moa 28:18 mobile 86:11 mode 76:16 model 46:13 65:6,25 66:4 98:17 models 30:9 modifications 94:9 modified 94:8 moment 9:8 money 4:13 33:12 33:12,17 75:23 montana 83:10 month 20:13 months 7:15 13:4 21:15,16 36:15 63:18 91:5 monumental 12:7 16:14 morning 2:1,6 15:1 15:6 17:9 56:5 63:8 70:21 86:7 mouth 76:24 move 36:16 38:2 50:3 51:10 60:1 80:18 91:8 93:11 94:11 95:3 97:18 100:5 moves 47:2 63:18 68:25 moving 36:17 76:14 76:16 92:24 95:8 96:4 97:4 multiple 13:16 65:19 93:1 myers 6:13
m			n
madam 55:24 60:4 mail 10:19,20,20 18:7 38:18 39:3 mailed 32:5 main 87:14 maintain 84:2 maintaining 86:24 major 7:20 14:2 88:11 majority 75:20 76:1			name 5:8 17:9 36:25 42:22 49:12 70:21 nation 4:3 17:11,13 62:2 national 1:1 4:16,19 4:21 5:10,21 18:14

33:6,21 56:10,12 native 4:23 5:2,4 natives 4:12 natural 51:23 nature 40:24 66:13 85:22 ncai 22:23 necessarily 13:15 51:12,18,21 52:1,7 77:16 84:25 91:16 94:20 necessary 67:6 need 2:15 3:9 7:18 9:10 10:22,23 11:4 12:5 13:13,18 15:22 20:11,17 21:8,20,21 21:22 22:4,4,18 26:1 27:18,24 28:2 28:20,25 29:5,19 30:2,9,21 31:11,18 32:7 33:2 34:19 36:16 38:1 49:8 57:20 69:9 71:21 72:1,2,5 73:16 74:2 75:7 76:19 77:18,18 79:24 80:12 84:8,13 90:12 97:17,23 100:3 needed 18:19 61:11 needs 10:16 14:8 20:16 31:2 69:18 75:8 88:11 91:14 negative 17:15 39:17 67:10,22 negotiated 21:25 65:5,24 negotiating 97:10 net 24:11 neutral 80:17 never 2:18 71:20 72:25 96:21,25 new 6:12 7:24 14:3 19:21 30:11 47:7 52:20 53:21 59:7 87:5 88:25 95:23	98:7 news 2:9 nice 82:25 nicer 17:17 nickel 4:7 niga 36:12 nigc 7:24 17:20 27:13,14 29:12,17 30:6 35:20 49:20 50:10 53:7 67:3,19 68:4 69:5 72:23 74:7,20 78:1 85:11 86:25 98:7 nigc's 74:11 nigc.gov 35:16 nj303781 1:25 noi 15:14 non 4:21 28:15 44:9 normal 54:8 notably 46:9 notary 101:20 note 34:6 45:2,24 46:17 47:19 noted 46:24 notes 14:22 101:7 notice 6:24 9:6 12:18 16:7,19 17:3 17:18 18:10 20:19 20:19,25 21:6,17 22:1,2,22 23:23 24:4,6 25:2,5,9,14 25:18 26:13,16 29:18,22,24 31:25 37:23 43:3,7 45:3 46:21 47:10 63:4,9 70:7 96:16 noticed 31:24,24 77:7 78:12 notification 67:19 notify 31:23 nourishment 90:3 november 16:8 22:23 96:15 number 10:20 15:14 18:7 20:23 24:13	26:2 27:16 28:10,12 30:5 31:3 35:14 38:13 83:3 85:13,20 97:8 numbers 38:24 o obama 18:22 objective 48:10 80:12,19 obligated 33:16 obligation 32:11 obliterate 27:22 obtaining 25:22 48:7 obviously 17:20 22:15 26:23 39:14 50:4 91:24 100:11 odd 87:6 offered 86:23 offering 10:23 offers 84:23 office 6:7 7:12,15,16 13:4 38:15 47:8 52:24 91:4 official 62:4 101:15 officials 20:10 28:15 32:11 oglala 62:1 oh 34:2 85:6 okay 12:24,25 14:7 31:6 42:12 70:12 97:12 oklahoma 17:11 old 59:20 85:7 88:6 older 48:25 omb 54:10 55:2,18 55:20 once 16:1 64:15 82:5 oneida 60:7 ones 44:12 60:23,24 68:20 87:20 88:18 91:7 open 8:3,7 16:20 17:2 37:12 38:3	39:8 42:14 49:4,9 67:7 80:9 84:2,5,10 84:20 95:23 opened 28:24 66:9 84:10 opening 2:4 14:22 69:6 operate 100:4 operated 87:16 operates 44:24 operating 21:10 83:24 operation 11:15 12:9 32:22 60:16 61:2,6 83:6,8,15 84:5 operations 9:19 10:9,17 11:12,19,20 12:3 14:12 22:9 32:16 33:8 61:10 69:8 75:19 82:19 83:22 84:8,12 89:2 94:18 opinions 27:1,18 41:6,10 opportunities 73:4 90:24 opportunity 9:24 14:7 23:2 29:22 40:16 43:2 53:2 56:2 57:3 58:1,23 72:3,15 84:23 options 35:8 order 19:6,12,14,16 19:23 20:3 34:21 36:1 88:5 93:11 ordinance 27:15 organization 37:1 originally 77:12 osceola 3:12,13 98:13 99:9 ought 72:11 74:12 outcome 52:2 outreach 54:10,11 58:5
--	--	--	---

outside 5:24 9:1 61:5 74:22 outweighs 25:24 overall 81:17 overhead 75:24 overly 46:12 overreaching 56:20 56:21 oversight 25:10 49:16,18,21 50:8 overview 37:19,23	pass 2:10 passage 85:12 passed 4:15 59:17 87:15 path 39:14 patience 76:19 patient 37:16 patting 19:2 paul 39:23 pawnee 17:10 paxton 6:12 11:23 60:20 pay 9:10 33:17 paying 20:5 payment 43:18 pays 43:16 people 6:20 7:3 21:2 24:2 25:8 26:13,17 30:19 51:16 61:9,12 61:22 72:19 76:4 78:17 79:6 82:8,15 92:25 96:22 percent 38:19 75:20 75:21 percentage 43:17,18 percolated 93:6 96:11 perfect 61:15,16 80:25 96:24 performed 58:4 person 75:25 79:4,4 personnel 25:10 perspective 3:17 27:21 50:2 68:21 phone 18:7 38:13,22 40:11 90:3 phones 38:16 90:4 pick 79:3 pilot 28:3,8 77:8 pioneers 59:21 place 13:1 28:9 29:2 38:25 40:3 64:10 66:12 69:10 70:10 74:20 80:2 83:9,25 89:10 93:22 101:8	places 2:13 82:4,4 84:8 91:18 plains 71:2 plan 92:24 plate 21:20 play 88:14 played 87:22 please 15:15 17:24 21:2 28:5 36:24 97:13,21 98:2 99:25 100:15 poarch 42:23 44:24 point 14:1 15:18 45:21 53:5 64:8 67:7 68:22 75:14 83:20 84:6 pointed 83:9 86:7 points 13:21 77:1 policies 20:7 21:1 34:23 98:20 policy 8:1,18 21:4 31:20 51:7,7 75:13 95:18 politics 54:4 pony 32:6 portal 67:25 68:1 portions 79:8 position 24:3 33:24 50:14 58:6 positions 15:16 possible 12:4 34:25 35:3 37:8 88:24 93:13 94:15 possibly 32:1 53:3 82:10 posted 23:6 35:12 potential 30:11 41:21 pound 4:7 poust 5:22 poverty 71:1,22 power 71:24 powerpoint 16:19 17:21,23	practical 46:5 practice 8:14 55:6 practices 52:14 prayer 2:16 pre 29:22 92:4 predicate 66:23 preference 95:18 preferences 95:16 premise 100:4 prepared 16:22,25 55:25 prerogative 12:24 presence 71:3 presentation 40:20 preserved 59:21 president 18:22 president's 54:11 presidential 21:13 press 26:19 92:17 pressures 46:3 pretty 21:18 61:20 89:13 91:4 prevent 11:11 previous 53:19 83:2 primarily 56:16 80:6 primary 21:7 28:15 31:16 58:17 60:12 printing 28:13,13 priorities 8:10 9:15 14:2 21:21 47:1,9 63:21 76:10,11,12 prioritize 65:8 priority 13:15 21:9 34:13 49:5,8 63:14 68:22 72:13 73:3,6 74:13 75:4 91:17,20 93:11 privately 88:10 95:11 probably 2:15 18:13 21:15 23:8 30:16 53:25 62:17 71:12 73:24 90:21
p			
p.m. 100:20 packer 60:8 packet 17:23,24 packets 6:6 page 19:22,25 23:7 101:5,8 paperwork 32:23 77:10 paradise 3:14 part 19:18,18 39:3 41:25 49:21 63:24 64:2 65:7,9,24 70:8 70:11 75:16,18 77:9 78:12 88:8 participate 36:19 66:10,11 participating 45:13 participation 36:20 particular 7:7 16:10 16:14 17:2 20:3 41:7 43:13 45:2 50:22 51:4 69:4 91:7 92:8 particularly 42:10 49:23 50:11 67:10 partly 72:13,14 partner 10:10 100:6 partnership 58:15 87:9 parts 76:17 party 43:18 67:23 80:17			

problem 54:16 73:2 problematic 95:5 problems 9:12 11:11 40:23 50:7 53:10 55:11 66:6 82:13 procedures 77:24 proceeding 26:7 proceedings 1:9 92:5 100:20 101:9 101:12 process 10:13 11:9 15:18 16:16,16 17:20 18:6,11 19:9 21:13 24:21 26:8,14 27:3,20 28:13 29:4 30:23 36:8 52:21,23 53:11 55:1,15 63:8 63:14,18 64:5 65:5 66:9 67:9 68:25 75:16 85:18 86:6,15 89:22 96:13,17,20 96:21 97:5,11,18 processes 93:25 produced 79:10 product 36:21 45:17 45:20 57:16 58:19 58:22 59:2 productive 57:4,21 products 60:19 79:10 profit 83:11 profitable 84:1 program 10:14 11:8 28:3,8 46:7 68:12 68:12 70:5 74:5 77:8,20 progress 57:1,6 98:14 progressed 4:8 promise 82:25 promotions 95:24 promulgate 27:8 promulgated 49:20 73:21	proper 29:2 properly 30:20 46:2 proponent 88:24 proposal 22:2 proprietary 31:3,8 31:13 40:24 41:3,17 92:6 protect 10:8 51:20 80:4 protected 54:5 protecting 61:3 87:4 protection 80:5 protocol 38:5 proven 83:23 provide 12:13 13:10 26:13 34:4 35:7 43:3 63:3 89:6 providing 10:10 11:4 12:5 51:1 provisions 31:9 public 101:20 published 16:8 22:22 32:4 pull 59:14 purchase 33:10 83:14 purchasing 33:14 purpose 37:19 75:5 89:10 91:12 purposes 44:9 54:2 95:22 pushing 3:7 13:7 put 10:18 13:1 19:7 21:17 23:14,23 24:25 29:2,21 31:2 31:11 32:5,25 33:17 33:18 50:13,14 54:9 59:3 68:2 69:10 70:7,11 72:8 84:4 putting 18:15 29:4 33:11,13 51:11 100:14	q question 41:3 47:23 49:14 52:18 54:22 54:23 55:14 67:7 91:2,12 95:3 questions 15:15 20:25 21:7 38:11 39:7 40:13 42:14 82:23 84:17 90:12 95:13 98:2 100:3 quick 15:8 56:4 81:14 quicker 78:25 79:10 quickly 57:9 quite 11:1 12:7 54:18,22 r raise 17:24 raised 23:25 29:15 31:10 46:20 raker 3:4 randi 1:12 101:19 rapid 15:5 17:17 25:11 reach 18:7 32:1 37:25 48:1 51:25 54:18,19 reaches 33:1 read 8:6 37:7 38:10 42:21 47:17 54:7 64:4 66:25 reading 47:22 ready 26:10 real 50:10 99:10 realize 6:25 really 5:17 6:1,1 11:8 12:10 15:24 16:5 17:5 18:9 19:20 20:4 21:13,18 21:20 22:4 23:12 25:23,23,24 35:2,18 36:21 39:2 42:11 58:10,10,20 60:8 64:20 65:6 66:6	67:1 68:19 74:2,20 86:17 90:19 91:12 97:7 rearrange 7:1 reasons 47:6 64:21 receive 17:24 received 35:22 recess 70:17 90:6 recognition 64:2 recognize 5:19,23 16:24 60:11,22 61:13 65:17 recommend 48:3 record 8:4 14:23 47:5 56:25 57:1 101:12 recorded 8:4 36:23 records 29:8,10,14 redefining 31:16 referee 81:7 referred 65:11 refining 51:22 reflect 12:12 57:16 reflection 57:7 refocusing 76:5 reg 12:7 reg.review 35:16 regard 35:4 41:1 42:10 45:4 49:19 50:2 regarding 18:5 21:1 40:20 62:18 68:6 85:21 region 6:9 75:7 regional 1:2 6:9 register 16:8 21:17 23:24 32:4 registration 68:9 regs 52:20,22 91:3,7 91:14 regular 41:24 regularly 61:21 regulate 4:4,11,22 4:24 11:13 74:21
--	---	--	--

regulated 64:19 regulation 3:23 13:17 25:21,21 26:1 28:11,22,24 29:2,4 29:12,21 30:8,21 31:12,20 33:16 34:11,14 46:1,12 47:20,20 48:8,11,17 48:24,24 49:6 51:17 51:19,22,22,25 52:20 63:13 64:5,15 64:16 73:19,23 77:2 79:21 81:25 92:10 regulations 8:1,11 12:20,21 13:1,11 16:13 18:15 19:1 20:18 21:8 24:5,9 27:10,25 29:13,20 30:11,12,14 35:4 36:1 43:6 45:15,19 45:23,25 46:5 48:25 49:7,15,19 50:4,16 51:13,14,15 52:8,11 58:16 61:1 62:18 63:4,20,24 64:9,23 65:22 66:14,17,20 66:22,23 67:1,6 71:14,15 73:24,24 77:6,18 81:22 82:6 82:17,18 83:4 85:17 92:1 94:20,21 regulator 89:15 regulators 45:11 58:18 60:12 80:6 89:16 regulatory 6:24 12:16,22 14:5,12 17:19 18:6,12,14,17 18:24 19:6,7,25 31:2 35:23 46:8 50:6 53:23 54:9 55:3 56:17 58:17 64:9 73:6 91:10 94:7,18	reinventing 69:22 reiterate 86:18 related 49:23 relates 41:18 relationship 7:21 40:6,14 85:23 86:23 86:25 release 67:22 released 12:18 releasing 68:5 relevant 13:2 reliance 58:14 relying 10:13 remain 44:4,22 remarks 40:19 remember 89:4 96:18 98:11 remembering 71:23 remind 37:21 75:3 88:4 93:20 94:25 98:17 reminded 61:25 reminder 95:2 reminding 88:17 reopen 90:10 reported 101:9 reporter 101:19 reporter's 1:9 represent 37:1,2 57:12 59:6 representation 78:14,17 representative 66:16 73:11 representatives 66:10 represented 25:4 81:3 representing 49:13 request 44:2 requested 77:12,13 require 44:7 required 10:5 19:5 77:13	requirement 10:7 66:24 67:2 83:12 requirements 64:14 64:16 82:21 84:4 requires 28:17 rescind 66:21 reservation 3:22 4:3 87:22 reservations 38:20 87:17 resolve 25:16 resource 72:17 resources 61:11 72:15,23,25 73:7 94:22 respect 44:14 49:20 63:10 66:2,19 respectful 57:4,22 respective 87:22 respond 84:22 response 11:1 51:23 81:21 responses 10:20 responsibilities 46:8 74:8 99:14 responsibility 98:21 responsible 88:8 rest 57:24 70:14 restrictions 66:12 result 87:15 retaining 67:9 retire 26:10 returning 90:10 revamping 43:5 45:25 revenue 24:8 43:19 revenues 24:11 43:17 44:9 review 6:24 11:15 12:8,9,16,22 14:5 14:12,12 16:7 17:3 17:19 18:6,12,19 19:8,25 35:22,23 43:7 44:1 45:8 54:9 86:6 91:10	reviewing 15:23 63:5 88:6 89:9 revise 45:19 revised 45:15 49:19 64:24 revising 34:14 revision 65:8 revisions 21:16 94:11,12 97:8 revisit 77:5 revisited 24:12 77:14 revitalize 71:4 revitalizing 74:4 revocation 67:18 revoke 67:18 rez 71:25 right 3:18 4:1 6:5,12 16:16 19:18 25:19 26:23 38:25 39:13 42:20 44:11 50:23 56:3 69:7 71:2,23 75:12 76:23 85:5 90:4 rigidity 81:18 ripple 61:8 rita 5:24 river 27:6 70:23,25 74:3 76:18 road 22:10 61:21 98:3 roberts 6:11 59:11 59:23 rock 1:10 2:14 98:4 role 49:18 74:11,12 85:12 87:17 88:14 97:11 roll 58:22,23 roof 2:13 room 5:23 26:21,22 26:23 37:2 53:17 65:14 70:14 81:7 rose 93:17 ross 2:25
--	--	--	--

rpr 1:13 101:19 rule 21:25 47:11 65:5,25 rules 21:15 65:20 81:4,8 ruling 21:12 run 11:18,20 12:12 88:20 running 12:3,15 runs 99:13 rush 62:22	49:6 58:14,14 63:24 64:5,9,15,16,19 92:10 selling 4:13 semiannual 19:7 seminole 1:10,10 2:3 4:5 5:5,12 15:4 17:13 40:1 56:7 63:1 68:15,21 70:24 99:8,23 100:11 senator 4:18,18,19 send 32:14 34:18 35:15 68:4 96:10 senior 2:25 sense 24:20 65:23 79:11 92:15 sent 32:4 36:10 67:19 separate 7:13 73:25 series 93:3 seriously 19:15 44:19 54:13 64:2 serve 40:17 45:20 51:2 61:12 80:16,17 96:1 services 12:5 33:15 89:25 session 15:9 93:17 set 30:18,21,22,24 38:24 45:15 47:1 48:4 74:19 76:11 79:22 81:4 101:8,14 sets 64:4,6 setting 74:18 settled 25:17 seven 60:24 shakopec 49:13 shapiro 70:21,22 76:21 81:20 share 3:9,10 13:24 43:8 sheriff 3:21 4:6 shift 46:8 shirts 22:11 98:5	shocks 96:24 shore 2:23 short 13:3 21:11 48:3 shot 7:11 show 22:10 57:24 58:20,25 62:6 77:7 98:23 shuffle 32:24 shy 37:5 side 9:1 16:11,12 50:19 53:20 65:18 65:18 71:18 80:15 87:11,11 89:14 96:18,25 sign 3:3 8:15 signal 32:6 significant 25:5 57:17,25 similar 9:23 30:8 72:19 77:20 95:24 simple 10:25 24:16 71:6,6 simplifies 24:21 simply 44:3 single 26:25 92:2 sioux 49:13 62:2 70:23,25 sir 42:16 85:6 89:24 sister 54:12 sit 9:21 26:9 37:4 site 19:17,19,21,23 23:4,8 29:8 32:5 34:16 35:17 75:9 sites 10:19 29:14 sitting 37:3 56:2 59:12 85:13 96:18 situation 10:11 32:12 71:9,11 situations 41:5 96:2 six 7:14 13:4 25:4 91:5 sizable 83:5 size 82:18	sizeable 83:7 slide 77:7 slow 28:5,6 slower 28:7 slows 2:14 small 82:18 83:21 84:5 97:16 smaller 78:16,23 83:25 84:7,8 92:19 92:20 93:14 smoke 32:6 snail 10:19 snow 2:17,18 sole 31:3,13 40:24 41:2,17 soliciting 63:11 solutions 80:8 98:22 99:4 solve 9:24 55:12 61:19 82:12 98:24 solving 9:11,11 soon 35:19 sophisticated 35:9 sort 8:16 21:9 24:25 27:22 34:12 49:24 50:8 64:11 79:14 92:11,12 93:14 95:20 sorts 66:11 sought 83:4 sound 95:4 south 38:19 71:5,7 sovereign 4:3 sovereigns 88:1 sovereignty 44:11 87:13 space 33:11 speak 6:2 28:7 36:24 39:24 43:9 62:5 70:22 85:5 speaking 12:20 34:8 99:11 specific 15:14 63:3 63:20
s			
safe 99:20,22 100:15 safeguard 11:12 52:6 saiz 40:10 sake 38:4 salaries 75:23 samples 78:5 san 34:7 sat 16:10 80:20 96:20 saying 23:18 67:24 81:21 91:21 94:21 says 16:20 20:6 34:22 schedules 16:23 screen 17:22 seal 101:15 second 10:4 secretary 5:25 section 20:4,5 34:21 34:22 sections 79:3 see 2:9 3:2,13 5:1,2 8:6 18:2,20 23:18 37:6 51:24 84:11,22 90:14 seeing 39:14 91:18 seek 58:5 seen 20:20 22:12 selected 30:22 self 25:21 46:1 47:20 48:8,11,17,24			

specifically 27:17 specify 29:12 spending 11:21 69:7 76:4,5 spent 45:9 spirit 60:1 spite 56:21 split 50:10 spokesperson 88:16 spot 50:14 stabilized 87:15 staff 2:8,22,24,25 3:6 5:1,24 6:13,16 6:19 11:23 13:6 15:21 19:19,20 22:5 23:12 32:15,19 40:7 49:18 58:4 60:19,21 76:15 85:21 100:13 staffed 75:21 staffing 75:22 stakes 3:18 stand 3:13 68:2 standard 82:9,10 standardize 41:16 standards 20:10,11 20:14 24:22 27:5 35:1,3 41:17 45:5,9 52:9,10,12 65:11,16 66:3 71:16 72:9 77:24 87:19 88:7 89:9 91:25 standpoint 27:3 stands 68:3 start 2:21 20:14 78:8 started 3:18,20 53:15 78:6 90:9 starting 45:21 state 3:22 4:1 5:10 36:25 44:25 101:2 stated 89:5 statement 37:7,8 42:21 56:12 69:6 statements 16:22 17:1 55:25 82:24	states 4:11,22 88:2 status 53:23 statute 10:6 50:5 54:7 64:4,4,13,17 66:24 statutory 10:7 51:9 52:4 60:14 stay 11:11 52:4 81:8 stenographic 101:7 stenographically 101:10 step 82:22 stephanie 42:18 steps 62:7 98:18,25 stevens 2:1 5:7,8 16:3 17:12 37:12,14 39:20 42:13 48:18 48:22 50:17 53:12 55:23,24 60:5,6 62:14,19 63:1 69:2 70:18 75:1 76:23 79:13 82:14 84:16 89:23 90:7 91:11 94:4 95:12 97:24 98:16 99:19 100:17 stop 6:17,23,23 7:6 13:17 21:14 22:15 stories 39:13 storm 7:2,3 straightforward 71:8 stranded 80:21 streamline 11:9 12:15 18:25,25 70:5 streamlined 94:8 street 3:19 stress 46:25 stretch 62:21 70:13 strong 58:15 strongly 43:13 65:7 structure 18:24 stuck 17:1 stuff 35:19 39:4 subcommittee 78:23	subgroups 81:12 subject 8:10 41:11 81:11 subjective 47:24 submission 43:22 44:4 submissions 25:20 submit 25:1 48:10 98:1 submitted 25:14 67:3 91:19 92:3 submitting 42:6 48:20 62:17 79:6 substance 16:17 34:8 substantial 25:15 30:1,1 93:8 substantive 40:19 45:24 succeed 99:18 success 56:23 60:3 98:15 successful 25:25 suck 65:13 sucks 26:20,22 sudden 26:11 sufficient 22:4 suggest 65:7 84:12 suggestion 78:11 suggestions 8:9 15:16,24 23:21 31:14 33:23 39:18 52:12 65:3 68:19 84:24 suit 80:12 suited 45:16 summary 35:24 summer 24:1 72:1 support 6:18,19 36:18 88:25 supporting 55:16 supreme 3:25 sure 3:8 7:9 8:22 11:3,6,9 12:1,14 28:1 32:13,19,25	38:11 46:17 52:3,17 52:23 54:5,15 55:4 57:14 59:5 71:7,13 71:19 73:3,7,10 75:12,15 76:17,22 80:4 84:6 89:9 95:21 99:12,22 suresh 3:3 surveillance 79:5 survey 10:18,21,25 11:5 75:5,9 suspend 67:17 system 24:25 67:21 69:17,20 92:3 systems 69:10,24 70:10
			t
			t 22:11 98:5 table 16:11 37:3 61:18 96:19 99:1 tailor 75:8 take 8:11 11:2 18:19 18:23 19:15 23:17 24:15 26:1 28:25 29:5,19 34:6 35:8 40:3 41:11 44:18 46:6,23 47:8 54:11 56:11 58:23 59:3 62:21 70:8,11,12 71:21 72:15 75:10 77:23 78:13 82:11 90:2 91:9 taken 15:17 19:11 24:3 33:24 68:24 70:17 71:25 90:6 101:7,12 takes 79:6 talk 8:17 9:5,7 12:19 13:19 14:13,16 18:8 20:15 22:17 52:10 62:3,3 85:17 88:10 90:17 98:10 talked 64:12 82:1 95:20

talking 4:18 7:25 16:5 37:17 44:20 49:14 51:13,14 53:15,18 71:13,14 71:15 72:1 82:15 87:25 95:15 96:6 98:13 talks 62:4 tap 67:25 77:20 taps 70:3 target 10:15,15 task 12:7,8 16:15 46:19 tasked 16:14 18:14 tax 67:21 taxes 75:23 team 59:9 teams 57:11,21 technical 10:4,14 14:11 27:5 45:5,9 65:10,15 66:2,13 71:16 75:4,17 76:7 76:13,15 79:15 91:25 technologies 88:25 technology 69:18,20 tell 10:16 21:2,4,14 36:4 49:17 91:13 98:22 telling 18:23 60:7 99:2 tenure 86:10 teri 5:22 term 13:5 terms 13:11 40:19 46:24 50:1,8 53:6 63:10,20 64:13,23 65:3,4 66:5 72:24 74:13 82:20 86:22 88:15,20,22 91:7 94:2 terrific 40:8 territory 5:13 thank 2:5 5:6,7 15:2 15:3 16:2 17:5,12	37:13,14 39:20 40:1 40:15 43:2,4 47:16 48:18 55:24 58:7 59:6,9 60:3,5 62:14 62:25 68:17 69:1,2 70:16,24 74:24 75:1 79:13 84:15,16 89:12,22,23,24 91:11 99:9,16 100:11,13,15,19 thanks 5:11 6:16,21 16:3 23:11 53:12 82:14 theory 41:18 thing 11:14 24:22 33:22 34:20 38:13 68:10 69:21 73:15 76:3 81:21 86:8 88:1 100:14 things 8:17 13:13,14 13:16 14:10,16 15:8 21:22 24:16 28:1 32:9,24 35:10 39:15 48:6 49:24 53:15 54:20 60:13 72:24 77:24 79:12 81:23 85:18,22 88:22 92:16,20,21 96:12 think 3:6 5:22 10:6 11:5 14:9 15:25 23:3 33:21 34:3 39:12,15,18 44:14 46:2 47:12 48:9 50:12 53:16 54:1 57:4,25 58:9,20 59:1 64:6,12,20 65:4,24 66:7,14,15 66:20 67:5,7,11 67:25 68:15,19 69:11 71:24 73:18 73:19,20,21 74:1,12 74:23 77:5,8,11,15 77:19,22 78:5,10,21 78:25 79:23 80:8 81:16,17 82:2,5,6	83:2 84:25 85:11,20 86:5,9,16,23 87:8 87:23,23 88:13 90:7 91:23 92:23 96:12 96:16 97:5,6 98:9 thinking 30:12 53:14 98:4 third 11:14 43:18 67:23 thorough 81:13,15 91:4 thought 12:7 48:16 77:1 87:13 thoughts 8:9 26:5 53:9 79:11 three 13:5 21:7 25:14 44:24 thrilled 96:19 throws 40:22 ticketing 24:25 92:2 tics 78:9 tiered 81:25 82:16 82:17 tiering 83:1,21 84:3 84:7,14 85:18 tiger 3:2 time 4:17 8:15 11:16 11:22 12:10 13:3,21 14:19,25 16:24 21:11,18 25:16 34:22 44:15,16 46:23 47:16 48:2,25 57:19 58:3,8 59:1,7 60:4 62:18 68:4 69:7 72:3 75:19 76:4,5 77:4,19 78:1 85:10,19 86:5,13,14 87:18 88:16 89:15 89:25 90:16,20 92:2 93:4,4,9 97:11,16 101:7,13 timely 81:12,15 times 86:4 87:24 timis 70:4	tiny 82:4 title 101:8 today 3:7 5:18 6:2 7:4,5,22 8:10,25 14:2,22 17:14 18:8 20:12 23:3 24:9 27:10 36:14 43:9 45:11 51:17 56:24 60:4 73:16 84:7 86:2,10 87:24 88:6 88:24 90:1,9 today's 9:6 12:17 46:11 told 27:7 67:21 tomorrow 45:11 tone 97:1 tool 20:22 top 64:22,22 93:6 topic 12:17 91:24 topics 46:20 tough 89:13 tour 6:23 7:7 90:22 tracie 2:1 5:7 16:3 37:14 39:20 42:13 48:18,22 50:17 53:12 60:5 62:19 69:2 70:18 75:1 76:23 79:13 82:14 84:16 89:23 90:7 91:11 94:4 95:12 97:24 98:16 99:19 100:17 track 56:25 57:1 tracks 65:20 93:2 tracy 5:8 90:21 trade 57:24 traditionally 9:17 traffic 80:17 training 10:5,11,14 10:22,22,24 11:3,4 74:5 75:4,5,8,11,17 76:8,13,16 transcribed 36:24 101:10
--	--	---	---

transcript 1:9 23:9 37:10 101:5 transcription 101:6 transcriptionist 6:8 transcripts 23:6 35:14 transparency 23:13 transparent 12:2 36:4,8 transplant 25:13 travel 7:1 22:17 91:1 99:21 travelling 8:20 99:22 travels 99:20 100:16 treasurer 3:2 treasury 54:20 tremendous 58:3 tribal 1:2 2:7 3:11 15:2,3,19,20 16:12 16:21 19:14,22 20:7 20:10,21 21:24 22:5 22:9 23:7 30:15,16 32:2,11,14,18,22 33:7 34:24 37:3 38:4,6,7,9 42:25 44:11 45:7,11,21 46:10 47:10 50:19 53:20 56:14,17,22 57:2,12,17 58:6,17 60:16,17 61:2 65:18 67:2 72:7 73:9,14 74:11 80:11,15 84:11 86:21 87:19 88:3,13,17 89:4,14 90:24 92:9 97:9 98:20 99:14 tribe 2:4 4:5 5:12 9:22,23 15:4 25:4,7 25:8 27:6 29:11 30:3 31:8 32:17 34:7 36:25 39:22 40:1,18 41:4 42:23 43:1 44:7 46:2 48:19 49:14 52:16	56:7 63:1,22 64:15 67:16 68:13,18 69:19 70:23,24,25 73:23 79:4 82:20,20 84:24 86:9 94:17 99:8,12,23 100:11 tribe's 24:18 68:4,21 tribes 4:23 5:9,16 7:24 8:2,5,19,23 9:14,16,20 10:8,18 11:4,11 12:5,20 13:11,12 14:6 15:10 17:6 22:16 23:17,18 24:2 25:1 27:12 28:12,19 31:4,10,19 33:3,12 34:25 35:10 36:6 44:2,12,17,23 46:6,9 49:2 59:6 60:11,23 61:23 62:10 64:7,8,8 65:1 66:9,24 67:20,24 68:8 69:5 70:2 74:19 75:7 76:13,18 78:6 79:20,22,25,25 80:3,6,8 81:2 84:1 84:18,21,21 85:13 85:24 87:1 88:14 90:19 91:13,21 94:6 94:10,12,25 95:6 96:2 97:1,15 98:8 98:21,22 99:16 trickle 11:7 tricky 41:15 tried 38:16 61:4 trimble 40:10 trinkets 4:13 trip 98:3 true 68:10 97:5 101:6,12 truly 20:16 45:16 58:6 try 13:9 47:25 56:3 61:5 72:8 trying 7:9 38:14 39:2,3 53:22 55:12	59:13,14 71:18,18 72:24 77:22 93:12 97:3 tuesday 1:12 tulalip 5:9 tulsa 2:14 turn 2:2 14:1,21 16:18 17:7 37:11 38:8 39:6 78:4 90:13 turning 12:6 turns 12:8 74:16 two 13:5,8 14:3 17:7 18:2,23 35:17 49:2 49:2 59:20 73:7 79:19 88:1 type 24:25 44:18,21 49:25 65:22 83:13 types 30:9 44:1 typewriting 101:11	update 19:1 86:6 updating 19:21 upfront 16:5 urge 72:22,22 73:5 use 24:11 28:14 36:24 66:1 68:16 70:13 72:23 73:7 81:25 useful 74:17 77:17 usually 79:5 utilized 30:20
v			
vague 47:23 variations 41:14 variety 64:21 various 32:3 41:9 49:16 65:20 vegas 29:11 vendor 68:9,11,15 vendorize 68:11 vendors 45:12 68:11 venture 44:16 venues 32:3 versus 4:5 vested 61:3 vet 52:21 vice 42:18 view 53:22 views 63:11 65:3 violate 31:8 44:3 violation 25:2,9,15 25:18 29:18,22,24 violations 25:5 virtual 60:13 visit 95:10 vital 34:3 86:20 88:1 89:8 voice 57:17 voluntary 44:5 49:3 volunteers 97:25			
w			
wages 75:23 wait 7:2			

walked 53:16 want 2:21 3:16 4:10 5:11,19,23 6:16,21 9:3 14:1,19,24 15:2 16:5 17:1 18:8 20:14,15 23:21 25:8 26:5,9 32:25 34:18 36:3,4,7,8 39:11,16 40:22 43:4 46:25 51:5 54:3 55:21 56:1 57:8 58:10,10 59:3,5 62:22 69:3 70:5,7 71:12 74:6 75:3 76:6,9,25 81:12,12,13,14,20 82:22 83:8 84:6 86:18 88:9 90:10,13 91:8,9 95:4 97:13 97:14 98:6 99:7 100:13 wanted 3:24 4:15 37:18 46:17 47:17 56:5,8,11 57:14 59:10,22,25 88:4 96:5 wanting 51:17 wants 68:14 warm 15:5 warmer 17:14 warn 90:22 washington 4:17 5:9 waste 44:15,15 48:2 68:4 water 70:14 71:24 way 1:10 3:7 8:13 12:4 22:7,21 23:14 25:19 27:21 37:18 45:4 47:13 55:21 59:23 60:13 77:22 78:2,15 81:16 97:15 97:17,19 98:7,23 99:17 ways 31:15 97:8,9 we've 24:9,19 26:12 28:22 43:9 60:20	weather 2:11 7:4 99:21 web 10:19 19:17,19 19:21,21,23,25 23:4 23:7 32:5 34:15 35:16 75:9 webster 3:1 62:25 68:18 73:17 wedded 51:12 week 23:1,11 35:11 38:15 60:24 weeks 18:23 weigh 14:7 welcome 2:6 3:14,15 4:25 5:5 15:2 16:1 wells 40:25 went 34:10 35:25 36:4 55:1 59:18 west 68:13 wheel 69:23,23 whereof 101:14 whined 96:21 white 2:9 48:15 55:18 wide 90:25 willing 89:20 willingness 58:5 wind 17:16 window 97:17 winds 93:23 wisconsin 60:7 wish 57:9 99:19 100:18 withdraw 29:17 withdrawn 73:19 witness 101:14 woman 26:20 wonderful 5:14 40:6 wondering 53:8 90:23 word 81:6 words 60:6,9 work 6:3,20 10:2 13:13,16 21:5 30:3 33:3 36:2 45:17,20	47:1 52:5,6 53:11 54:12 55:4,20 57:1 57:6 58:11,23,24 65:6 66:4 70:8,10 71:16 72:13,19 79:9 79:24 90:1,1 96:2 98:21 100:14 workable 41:20 worked 13:14 30:17 40:8 54:20 56:22 73:10 working 5:3 9:9 14:10 17:6 20:14 26:18 32:17 39:4,15 40:6 45:8 46:15 47:11 54:19,24 55:18 58:15 60:17 61:14 63:17 64:7 68:24 76:10,21 77:21 87:2 98:15 works 6:1,10 31:21 38:18 45:22 52:23 55:18 75:22 world 57:12 58:2 80:25 worth 4:7 72:16 writing 98:1 written 22:1,1,3 23:5 37:7,7 42:7 48:20 62:17 63:23 97:12 98:1 wrong 43:25 44:11	86:24 87:3,3,6 yesterday 11:5 15:6 45:10
		x	
		x 9:22	
		y	
		year 13:5 24:17,18 71:23 86:12 92:13 92:14,15 years 13:6,9 15:21 17:7 25:4 28:10 33:7 50:9 56:14 59:20 61:24 64:10 71:17,24 72:16 80:21 83:17,23	