

**Gaming Commission Regulations**  
Regulation #R400-04:GC-20

**Chapter 20 – Prohibitions on Gaming**

**Section 1. Purpose; Authority**

- 1-1. *Purpose.* It is the purpose of this Chapter to identify those persons or positions that are not allowed to play, place wagers at, or collect winnings from any Class II and/or III gaming (including limited gaming) offered at any Little River Band of Ottawa Indians gaming operation and to outline the rules by which other positions can participate in gaming.
- 1-2. *Authority.* These rules and regulations are issued under and pursuant to the authority of the Gaming Ordinance #10-400-01, Gaming Commission Ordinance #04-400-04, and Commissions Ordinance #04-105-01.

**Section 2. Definitions**

- 2-1. *General.* For purposes of this regulation, certain terms are defined in this section. The word “shall” is always mandatory and not merely advisory. Unless defined elsewhere, terms defined in this regulation, the Gaming Ordinance, and the Gaming Commission Ordinance are defined for the purposes of all Gaming Commission regulations.
- 2-2. *Compact (Tribal-State Compact)* means an agreement between the State of Michigan and the Little River Band of Ottawa Indians concerning Class III gaming approved or deemed approved by the Secretary of the Interior and published in the Federal Register pursuant to 25 U.S.C. § 2710(d).
- 2-3. *Complimentary service or item* means a service or item provided at no cost or at a reduced cost to a customer, at the discretion of an agent on behalf of the gaming operation or by a third party on behalf of the gaming operation.
- 2-4. *Employee* means any individual employed by a gaming operation or enterprise in any capacity, whether by general operational terms of employment, contract, or agreement.
- 2-5. *Gaming* means Class II and Class III gaming (including online gaming) authorized by the Gaming Ordinance #10-400-01, the Tribal-State Compact, and as may be further authorized under IGRA.
- 2-6. *Gaming device* means a microprocessor-controlled electronic device which allows a patron to play games of chance, some of which are affected by skill, which is activated by the insertions of a coin, currency, tickets, or credit, and which awards game credits, replays, or a receipt that can be redeemed by the patron.
- 2-7. *Gaming enterprise* means the entities through which the tribe conducts, regulates, and secures gaming on Indian lands with such tribe’s jurisdiction pursuant to the Indian Gaming Regulatory Act.

- 2-8. *Gaming operation* means each economic entity that is licensed by a tribe, operates the games, receives the revenues, issues the prizes, and pays the expenses.
- 2-9. *IGRA* means the Indian Gaming Regulatory Act of 1988, 25 U.S.C. § 2701 *et seq.*, as amended from time to time.
- 2-10. *Primary Management Official* means an employee who meets the following qualifications:
- a. Any person having management responsibility for a management contract (any contract, subcontract, or collateral agreement that provides for the management of all or part of an Indian tribe's gaming operation, requiring NIGC approval to ensure tribal protection and compliance with the Indian Gaming Regulatory Act (IGRA)).
  - b. Any person who has authority:
    1. To hire and fire employees of the gaming operation
    2. To establish policy for the gaming operation; or
  - c. The Chief Financial Officer or a position with duties similar to Chief Financial Officer.
  - d. The General Manager or a position with duties similar to a General Manager.
  - e. Any other person employed by the gaming enterprise as documented by the tribe as a Primary Management Official.
- 2-11. *Regulatory agency* means the Little River Band of Ottawa Indians Gaming Commission, created by Gaming Commission Ordinance #04-400-04, or such other regulatory body created by Ordinance.
- 2-12. *Tribe* means the Little River Band of Ottawa Indians.

### **Section 3. Tribal Government Employees, Regulatory Agency Members and Employees, Gaming Operation Oversight Body Prohibition on Participation in Gaming**

- 3-1. *Prohibition against Participation in Gaming at any Gaming Operation.* This section shall identify positions that shall be prohibited from play, placing wagers at, or collecting winnings from any Class II and/or Class III gaming and/or limited gaming at any Little River Band of Ottawa Indians gaming operations. Such prohibition is limited to gaming, and does not extend to conference, training, dining, hotel and other non-gaming activities.
- 3-2. *Gaming Operation Oversight Body.* All members of any gaming operation oversight body created by tribal law are prohibited from play, placing wagers at, or collecting winnings from any Class II and/or Class III gaming at any Little River Band of Ottawa Indians gaming operation.

- 3-3. *Tribal Government Employees.* The position names shall be for the purposes of identification and shall include any reasonably related position title that may be created in the future. Individuals that hold the following positions are prohibited from play, placing wagers at, or collecting winnings from any Class II and/or Class III gaming at any Little River Band of Ottawa Indians gaming operation.
- a. All attorneys
  - b. Chief Financial Officer and Controller
  - c. Comptroller General and support staff
  - d. Public Safety Department, officers, and support staff
  - e. Information Technology Department and support staff
- 3-4. *Regulatory Agency.* No member of the Gaming Commission or employee of the Gaming Commission may play, place wagers at, or collect winnings from any Class II and/or Class III gaming at any Little River Band of Ottawa Indians gaming operation unless as part of a job-related duty.

#### **Section 4. Gaming Operation Employee Limitations and Prohibition(s) on Participation in Gaming**

- 4-1. *Gaming Operation Employees Prohibited.* The position names shall be for the purposes of identification and shall include any reasonably related position title that may be created in the future. The following gaming operation employment positions are prohibited from play, placing wagers at, or collecting winnings from any Class II and/or Class III gaming (including limited gaming) at any Little River Band of Ottawa Indians gaming operation. Such prohibition is limited to gaming, and does not extend to conference, training, dining, hotel and other non-gaming activities.
- a. All Primary Management Officials as defined in Section 2-10
  - b. All Accounting/Revenue Audit, Information Technology, and Compliance employees
  - c. All Sports Book management

The gaming operation shall develop a policy identifying which positions other than those specifically identified within this regulation that are prohibited from playing, placing wagers at, or collecting winnings from any Class II and/or Class III gaming (including limited gaming) at any Little River Band of Ottawa Indians gaming operation and identifying parameters on the limitations of gaming (i.e., hours).

#### **Section 5. Prohibitions on Participation in Gaming**

- 5-1. *Elected Officials (excluding Election Board Members not prohibited under other*

*restrictions outlined in this regulation*). Elected Officials eligible to participate in gaming shall not be eligible to participate in, be eligible for, or offered to participate in the following. Such prohibition is limited to gaming, and does not extend to conference, training, dining, hotel and other non-gaming activities.

- a. Promotions
- b. Drawings or Promotional Drawings
- c. Tournaments

5-2. *Gaming Operation Employees.* Gaming operation employees eligible to participate in gaming shall **not** obtain and/or maintain an active Player's Club Card account or any cardholder benefits. Employees of the Slot Operations Department shall **not** play gaming devices and employees of the Table Games Department shall **not** play any Class II or III table and/or card game. Employees eligible to participate in gaming shall not participate in, be eligible for, or offered to participate in the following:

- a. Promotions
- b. Drawings or Promotional Drawings
- c. Tournaments

5-3. *Complimentary Services and Items.* Elected Officials nor employees of the gaming operation shall be offered or accept complimentary services or items, nor accrue complimentary value (rating(s)) with their play). The only exception to this is items and/or offers made in common to all Little River Band of Ottawa Indians Tribal Members during Tribal Membership Meetings (spring and fall).

5-4. *Point Redemption Awards.* Elected Officials shall accrue points, solely based on their play.