



## **Little River Band of Ottawa Indians Gaming Commission**

2840 Orchard Highway, Suite A  
Manistee, MI 49660

Tel: (231) 723-7755 • Fax: (231) 723-7788

### ***Report to Tribal Council for the Month of October 2019***

#### **I. Purpose, Officers.**

This is the monthly report of the Gaming Commission. The purpose of the Commission is to ensure the integrity, honesty and fairness of all gaming activities conducted on the Tribe's Reservation and that such gaming activities be conducted in conformance with the Gaming Ordinance #10-400-01, Rules and Regulations promulgated by the Gaming Commission, the Indian Gaming Regulatory Act, and any applicable Class III gaming compact or Class III gaming rules.

Bill Willis, Chairperson  
Debra Davis, Secretary  
Mark Jespersen, Commissioner  
Steve Parsons, Commissioner  
Alyce Giltz, Commissioner

#### **II. Activities during the Past Month:**

During the month of October the Gaming Commission:

- held four regular meetings
- held one special meeting
- held one licensing hearing

#### **III. Concerns/Requests:**

#### **IV. Attachments. The following documents are attached to this report.**

##### **Minutes:**

1. September 24, 2019
2. October 1, 2019
3. October 8, 2019
4. October 15, 2019

##### **Resolutions:**

1. Gaming Commission Resolution #GC19-1015-18 Approval of Expenditure from North American Video for Ten (10) Dome, Ultra VIIIE, Col Cam Module Cameras in the Amount of \$16,625.00
2. Gaming Commission Resolution #GC19-1015-19 Approval of Revised Gaming Commission Regulation #R400-04:GC-19 Chapter 19 – Non-Gaming Vendor Licensing
3. Gaming Commission Resolution #GC19-1022-20 Repealing of Gaming Commission Regulation #R400-04:GC-05 Chapter 5 – Surveillance Requirements Regulation
4. Gaming Commission Resolution #GC19-1029-21 Approval of Revised Gaming Commission Regulation #R400-04:GC-11 – Chapter 11 – Class III Minimum Internal Control Standards for Gaming Enterprises of the Little River Band of Ottawa Indians

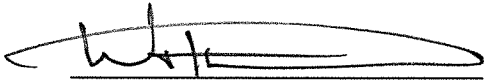
##### **Commission Orders:**

1. Gaming Commission Order #GC19-1015-05 Granting Exemption from Vendor Licensing Requirements for Listed Food Vendors

**Other:**

**Reports:**

1. Administrative, Licensing, and Background Investigations
2. Compliance Department
3. Surveillance Department



**Chairperson**

10/30/19  
**Date**

**LITTLE RIVER BAND OF OTTAWA INDIANS  
GAMING COMMISSION MEETING  
OPEN SESSION MEETING**

**September 24, 2019**

Gaming Commission Conference Room  
2840 Orchard Highway, Suite A  
Manistec, MI 49660

**Meeting called to order at 5:37 p.m. by Chairperson, Bill Willis**

**Present:**

**Commissioners:** Bill Willis, Debra Davis, Alyce Giltz, Mark Jespersen, Steve Parsons  
**Commission Staff:** Kelly Maser  
**Others:** Lee Ivinson

**Approval of Open Session Agenda:**

**a) September 24, 2019**

**Action:** B. Willis made a motion to approve the Open Session Agenda for September 24, 2019. **Seconded by D. Davis**

**Roll Call:** D. Davis – Yes / M. Jespersen – Yes / S. Parsons – Yes / B. Willis – Yes / A. Giltz – Yes / 5-Yes, 0-No, 0-Abstain, 0-Absent. **MOTION CARRIED**

**Approval of Open Session Minutes:**

**a) September 17, 2019**

**Action:** M. Jespersen made a motion to approve the Open Session Minutes for September 17, 2019. **Seconded by D. Davis**

**Roll Call:** M. Jespersen – Yes / B. Willis – Yes / A. Giltz – Yes / S. Parsons – Abstain / D. Davis – Abstain / 3-Yes, 0-No, 2-Abstain, 0-Absent. **MOTION CARRIED**

**Old Business:**

**None**

**New Business:**

**a) Approval of Revised Gaming Commission Regulation – Chapter 11 – Class III Minimum Internal Control Standards for Gaming Enterprises of the Little River Band of Ottawa Indians**

**Action:** B. Willis made a motion to approve Gaming Commission Resolution #GC19-0924-17 approving the revised Gaming Commission Regulation #R400-04:GC-11 – Chapter 11 – Class III Minimum Internal Control Standards for Gaming Enterprises of the Little River Band of Ottawa Indians with minor the revisions as discussed. **Seconded by S. Parsons**

**Roll Call:** B. Willis – Yes / D. Davis – Yes / M. Jespersen – Yes / A. Giltz – Yes / S. Parsons – Yes / 5-Yes, 0-No, 0-Abstain, 0-Absent. **MOTION CARRIED**

**Discussion Period:**

- a) Service Vendor threshold (Lee)**
- b) Non-Gaming Vendor licensing renewal process (Lee)**

**Next Gaming Commission Meeting**

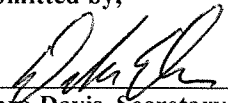
- a) October 1, 2019 at 5:30 p.m.**

**Adjournment of Open Session:**

**Action:** B. Willis made a motion to adjourn the Open Session at 6:48 p.m. Seconded by D. Davis

**Roll Call:** S. Parsons – Yes / A. Giltz – Yes / B. Willis – Yes / D. Davis – Yes / M. Jespersen – Yes / 5-Yes, 0-No, 0-Abstain, 0-Absent. **MOTION CARRIED**

Submitted by,

  
Debra Davis, Secretary

10-1-19  
Date

**Items moved to Open Session:**

None



**LITTLE RIVER BAND OF OTTAWA INDIANS  
GAMING COMMISSION MEETING  
OPEN SESSION MEETING**

**October 1, 2019**

Gaming Commission Conference Room  
2840 Orchard Highway, Suite A  
Manistee, MI 49660

**Meeting called to order at 5:32 p.m. by Chairperson, Bill Willis**

**Present:**

**Commissioners:** Alyce Giltz, Bill Willis, Mark Jespersen, Debra Davis, Steve Parsons

**Commission Staff:** Kelly Maser, Erford Edmondson

**Others:** Lee Iverson, Rebecca Liebing (arrived at 5:35 p.m.), James Henderson

**Approval of Open Session Agenda:**

**a) October 1, 2019**

**Action:** B. Willis made a motion to approve the Open Session Agenda for October 1, 2019. **Seconded by D. Davis**

**Roll Call:** M. Jespersen – Yes / S. Parsons – Yes / A. Giltz – Yes / D. Davis – Yes / B. Willis – Yes / 5-Yes, 0-No, 0-Abstain, 0-Absent. **MOTION CARRIED**

**Approval of Open Session Minutes:**

**a) September 24, 2019**

**Action:** B. Willis made a motion to approve the Open Session Meeting Minutes for September 24, 2019. **Seconded by D. Davis**

**Roll Call:** B. Willis – Yes / A. Giltz – Yes / M. Jespersen – Yes / S. Parsons – Yes / D. Davis – Yes / 5-Yes, 0-No, 0-Abstain, 0-Absent. **MOTION CARRIED**

**Old Business:**

None

**New Business:**

None

**Discussion Period:**

- a) Request for Increase to Service Vendor Threshold (Lee)**
- b) Request for Non-Gaming Vendor Licensing Renewal Process/Period (Lee)**
- c) Revisions Gaming Commission Regulation – Chapter 19 – Non-Gaming Vendor Licensing at the request of the Gaming Commission**
- d) Revisions to Gaming Commission Regulation – Chapter 4 – Notifications and Reports forthcoming**
- e) Revisions to the Service Vendor Program forthcoming (Lee)**
- f) Gaming Device Testing beginning October 14, 2019 (Erford)**

**Next Gaming Commission Meeting**

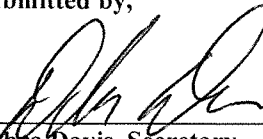
- a) October 8, 2019 at 5:30 p.m.**

**Adjournment of Open Session:**

**Action:** B. Willis made a motion to adjourn the Open Session at 5:45 p.m. **Seconded by D. Davis**

**Roll Call:** S. Parsons – Yes / B. Willis – Yes / D. Davis – Yes / M. Jespersen – Yes / A. Giltz – Yes / 5-Yes, 0-No, 0-Abstain, 0-Absent. **MOTION CARRIED**

Submitted by,

  
Debra Davis, Secretary

10-8-19  
Date

**Items moved to Open Session:**

**a) Approval of Vendor License – Bally Gaming, Inc. d/b/a Bally Technologies**

**Action:** B. Willis made a motion approve the renewal application for Gaming Vendor – Bally Gaming, Inc. doing business as Bally Technologies – license effective date November 15, 2019 – license expiration date November 15, 2020. **Seconded by S. Parsons**

**Roll Call:** M. Jespersen – Yes / S. Parsons – Yes / B. Willis – Yes / A. Giltz – Yes / D. Davis – Yes / 5-Yes, 0-No, 0-Abstain, 0-Absent. **MOTION CARRIED**

**b) Approval of Vendor License – Shye West, Inc. d/b/a Imagine This**

**Action:** B. Willis made a motion to approve the renewal application for a Non-Gaming Renewal Vendor License Application for Shye West, Inc. doing business as Imagine This – license effective date October 24, 2019 – license expiration date October 24, 2020. **Seconded by D. Davis**

**Roll Call:** S. Parsons – Yes / D. Davis – Yes / M. Jespersen – Yes / B. Willis – Yes / A. Giltz – Yes / 5-Yes, 0-No, 0-Abstain, 0-Absent. **MOTION CARRIED**



**LITTLE RIVER BAND OF OTTAWA INDIANS  
GAMING COMMISSION MEETING  
OPEN SESSION MEETING  
October 8, 2019**

Gaming Commission Conference Room  
2840 Orchard Highway, Suite A  
Manistee, MI 49660

Meeting called to order at 5:35 p.m. by Chairperson, Bill Willis

**Present:**

**Commissioners:** Alyce Giltz, Bill Willis, Mark Jespersen, Debra Davis, Steve Parsons

**Commission Staff:** Kelly Maser

**Others:** Rebecca Liebing (arrived at 5:36 p.m.)

**Approval of Open Session Agenda:**

a) **October 8, 2019**

**Action:** B. Willis made a motion to approve the Open Session Meeting Agenda for October 8, 2019. **Seconded by D. Davis**

**Roll Call:** M. Jespersen – Yes / S. Parsons – Yes / A. Giltz – Yes / D. Davis – Yes / B. Willis – Yes / 5-Yes, 0-No, 0-Abstain, 0-Absent. **MOTION CARRIED**

**Approval of Open Session Minutes:**

a) **October 1, 2019**

**Action:** D. Davis made a motion to approve the Open Session Meeting Minutes for October 1, 2019. **Seconded by M. Jespersen**

**Roll Call:** B. Willis – Yes / A. Giltz – Yes / M. Jespersen – Yes / S. Parsons – Yes / D. Davis – Yes / 5-Yes, 0-No, 0-Abstain, 0-Absent. **MOTION CARRIED**

**Old Business:**

None

**New Business:**

None

**Discussion Period:**

No representative from the gaming enterprise present

Revised Gaming Commission Regulation – Chapter 19 comments (staff/gaming enterprise) (Kelly)

Update MGCBA Audit (Kelly)

**Next Gaming Commission Meeting**

a) **October 15, 2019 at 5:30 p.m.**

**Adjournment of Open Session:**

**Action:** B. Willis made a motion to adjourn the Open Session at 6:10 p.m. **Seconded by D. Davis**

**Roll Call:** S. Parsons – Yes / B. Willis – Yes / D. Davis – Yes / M. Jespersen – Yes / A. Giltz – Yes / 5-Yes, 0-No, 0-Abstain, 0-Absent. **MOTION CARRIED**

Submitted by,

  
Debra Davis, Secretary

10-15-19  
Date

Items moved to Open Session:

None



**LITTLE RIVER BAND OF OTTAWA INDIANS  
GAMING COMMISSION MEETING  
OPEN SESSION MEETING**

**October 15, 2019**

Gaming Commission Conference Room  
2840 Orchard Highway, Suite A  
Manistee, MI 49660

Meeting called to order at 5:32 p.m. by Chairperson, Bill Willis

**Present:**

**Commissioners:** Steve Parsons, Alyce Giltz, Mark Jespersen, Debra Davis, Bill Willis  
**Commission Staff:** Kelly Maser  
**Others:** Lee Ivinson

**Approval of Open Session Agenda:**

**a) October 15, 2019**

**Action:** B. Willis made a motion to approve the Open Session Meeting Agenda for October 15, 2019. **Seconded by D. Davis**

**Roll Call:** S. Parsons – Yes / M. Jespersen – Yes / A. Giltz – Yes / D. Davis – Yes / B. Willis – Yes / 5-Yes, 0-No, 0-Abstain, 0-Absent. **MOTION CARRIED**

**Approval of Open Session Minutes:**

**a) October 8, 2019**

**Action:** S. Parsons made a motion to approve the Open Session Meeting Minutes for October 8, 2019. **Seconded by D. Davis**

**Roll Call:** M. Jespersen – Yes / A. Giltz – Yes / B. Willis – Yes / S. Parsons – Yes / D. Davis – Yes / 5-Yes, 0-No, 0-Abstain, 0-Absent. **MOTION CARRIED**

**Old Business:**

None

**New Business:**

**a) Approval of Expenditure from NAV for Ten (10) Dome, Ultra VIIE, Col Cam Module Cameras in the Amount of \$16,625.00**

**Action:** S. Parsons made a motion to approve Gaming Commission Resolution #GC19-1015-18 approval of expenditure from North American Video for ten (10) Dome, Ultra VIIE, Col Cam Module cameras in the amount of \$16,625.00. **Seconded by B. Willis**

**Roll Call:** B. Willis – Yes / D. Davis – Yes / M. Jespersen – Yes / S. Parsons – Yes / A. Giltz – Yes / 5-Yes, 0-No, 0-Abstain, 0-Absent. **MOTION CARRIED**

**b) Approval of Revised Gaming Commission Regulation – Chapter 19 – Non-Gaming Vendor Licensing**

**Action:** B. Willis made a motion to approve Gaming Commission Resolution #GC19-1015-19 approval of revised Gaming Commission Regulation #R400-04:GC-19 – Chapter 19 – Non-Gaming Vendor Licensing with revisions as discussed. **Seconded by S. Parsons**

**Roll Call:** D. Davis – Yes / S. Parsons – Yes / M. Jespersen – Yes / A. Giltz – Yes / B. Willis – Yes / 5-Yes, 0-No, 0-Abstain, 0-Absent. **MOTION CARRIED**

**Discussion Period:**

Gaming Commission Regulation – Chapter 4 – Notification and Reports revisions forthcoming (Kelly)  
Service Vendor Program revisions forthcoming (Lee)  
Facility IHS Inspection (Lee)  
West Wing Construction (Lee)

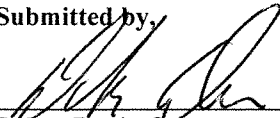
**Next Gaming Commission Meeting**

a) **October 22, 2019 at 5:30 p.m.**

**Adjournment of Open Session:**

**Action:** B. Willis made a motion to adjourn the Open Session at 6:25 p.m. **Seconded by D. Davis**  
**Roll Call:** S. Parsons – Yes / D. Davis – Yes / M. Jespersen – Yes / B. Willis – Yes / A. Giltz – Yes / 5-Yes, 0-No, 0-Abstain, 0-Absent. **MOTION CARRIED**

Submitted by,

  
Debra Davis, Secretary

10-22-19  
Date

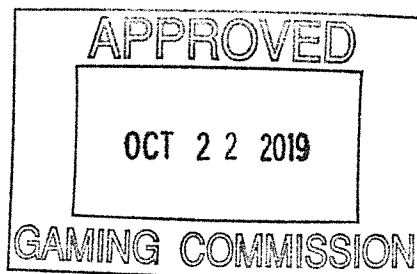
**Items moved to Open Session:**

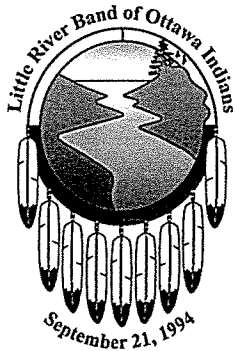
a) **Vendor Licensing Exemption Request – Food Vendors**

**Action:** B. Willis made a motion to approve Gaming Commission Order #GC19-1015-05 granting exemption from vendor licensing requirements for the food vendors listed in the Order. **Seconded by S. Parsons**  
**Roll Call:** B. Willis – Yes / S. Parsons – Yes / D. Davis – Yes / A. Giltz – Yes / M. Jespersen – Yes / 5-Yes, 0-No, 0-Abstain, 0-Absent. **MOTION CARRIED**

b) **Approval of Vendor License – Aruze Gaming America, Inc.**

**Action:** B. Willis made a motion to approve the renewal application for Gaming Vendor Aruze Gaming America, Inc. – license effective date November 6, 2019 – license expiration date November 6, 2020. **Seconded by S. Parsons**  
**Roll Call:** D. Davis – Yes / A. Giltz – Yes / M. Jespersen – Yes / S. Parsons – Yes / B. Willis – Yes / 5-Yes, 0-No, 0-Abstain, 0-Absent. **MOTION CARRIED**





**Little River Band of Ottawa Indians  
Gaming Commission**

Manistee, MI 49660

Tel: (231) 723-7755 • Fax: (231) 723-7788

**Gaming Commission Resolution #GC19-1015- 18**

**Approval of Expenditure from North American Video for Ten (10) Dome, Ultra  
VIIIE, Col Cam Module Cameras in the Amount of \$16,625.00**

WHEREAS, the Tribe's status as a federally-recognized Indian Tribe was reaffirmed and restored by Congress pursuant to Public Law 103-324, 108 Stat. 2156 (25 U.S.C. § 1300k et seq.); and

WHEREAS, the Tribe adopted a Constitution, pursuant to a vote of the membership on May 27, 1998, which Constitution became effective upon its approval by the Assistant Secretary-Indian Affairs on July 10, 1998; and

WHEREAS, the Tribe adopted amendments to the Constitution on April 26, 2004, which became effective upon approval by the Assistant Secretary-Indian Affairs on May 13, 2004; and

WHEREAS, the Tribe adopted amendments to the Constitution on July 11, 2016 which became effective upon approval by the Assistant Secretary-Indian Affairs on August 24, 2016; and

WHEREAS, the Tribal Council adopted Gaming Commission Ordinance # 04-400-04 which created a Gaming Commission and delegated to such Commission the authority to regulate all gaming activities authorized by the Tribe and to enforce all Tribal and federal laws governing the conduct of Tribally licensed gaming activities; and

WHEREAS, the surveillance digital system requires properly functioning equipment to operate and due to aging equipment, cameras need to be replaced; and

WHEREAS, the Surveillance Department budget does include funds to cover this expenditure and a quote was obtained from North American Video for the purchase of Ten (10) Dome, Ultra VIIIE, Col Cam Module Cameras in the Amount of \$16,625.00; and

WHEREAS, the preferred vendor (sole source) for the purchase of this equipment is North American Video based on the fact that these cameras will be compatible with other equipment that has been purchased through North American Video; and

LRGC Resolution #GC19-1015-18  
Approval of Expenditure from North American Video  
for Ten (10) Dome, Ultra VIIIE, Col Cam Module Cameras in the Amount of \$16,625.00  
Page Two

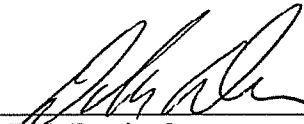
WHEREAS, the Budget and Appropriations Regulation – Chapter 1 – Purchasing and Procurement – Section 3-2 (4) (d) designates purchases of \$12,000.01 to \$25,000.00 requires authorization from the Gaming Commission by resolution.

NOW THEREFORE IT IS RESOLVED THAT the Gaming Commission hereby approves the expenditure for ten (10) Dome, Ultra VIIIE, Col Cam Module cameras in the amount of \$16,625.00 from the approved 2019 Gaming Commission Surveillance Department Budget.

#### **Certificate of Adoption**

I, Deb Davis, Secretary of the Little River Band of Ottawa Indians Gaming Commission, do hereby certify that this resolution was adopted on October 15, 2019 by a vote of 5 in favor, 0 opposed, and 0 abstentions and 0 absent. This resolution has not been amended or rescinded in any way.

Attest:

  
\_\_\_\_\_  
Deb Davis, Secretary

Distribution: Commission Records  
Tribal Council Liaison



**Gaming Commission**  
2840 Orchard Highway, Suite "A"  
Manistee, MI 49660  
Tel: (231) 723-7755 • Fax: (231) 723-7788

## **Gaming Commission Resolution #GC19-1015-19**

### **APPROVAL OF REVISED GAMING COMMISSION REGULATION #R400-04:GC-19 CHAPTER 19 – NON-GAMING VENDOR LICENSING**

WHEREAS, the Tribe's status as a federally-recognized Indian tribe was reaffirmed and restored by Congress pursuant to Public Law 103-324, 108 Stat. 2156 (25 U.S.C. § 1300k et seq.); and

WHEREAS, the Tribe adopted a Constitution, pursuant to a vote of the membership on May 27, 1998, which Constitution became effective upon its approval by the Assistant Secretary-Indian Affairs on July 10, 1998; and

WHEREAS, the Tribe adopted amendments to the Constitution on April 26, 2004, which became effective upon approval by the Assistant Secretary-Indian Affairs on May 13, 2004; and

WHEREAS, the Tribe adopted amendments to the Constitution on July 11, 2016 which became effective upon approval by the Assistant Secretary-Indian Affairs on August 24, 2016; and

WHEREAS, the Tribal Council has, pursuant to Gaming Commission Ordinance #04-400-04, created a Gaming Commission and delegated to such Commission the authority to regulate all gaming activities authorized by the Tribe and to enforce all Tribal and federal laws governing the conduct of Tribally-licensed gaming activities; and

WHEREAS, Section 6.04 (a) of the Gaming Commission Ordinance permits the Gaming Commission to promulgate regulations and internal operational procedures of the Gaming Commission and its staff; and

WHEREAS, Chapter 19 – Non-Gaming Vendor Licensing was approved by the Gaming Commission on February 20, 2018; and

WHEREAS, and a recent request for consideration by the gaming enterprise, risk analysis, and evaluation of licensing requirements within multiple regulatory jurisdictions has caused the Gaming Commission to evaluate and revise its licensing requirements for Non-Gaming Vendors.

Gaming Commission Resolution #GC19-1015- 19  
Approval of Revised Gaming Commission Regulation #R400-04:GC-19  
Chapter 19 – Non-Gaming Vendor Licensing  
Page Two

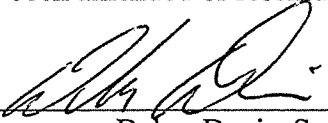
NOW THEREFORE IT IS RESOLVED THAT the Little River Band of Ottawa Indians Gaming Commission hereby approves Gaming Commission Regulation #400-04:GC-19 – Chapter 19 – Non-Gaming Vendor Licensing; and

IT IS FURTHER RESOLVED THAT Gaming Commission Regulation #R400-04:GC-19 – Chapter 19 – Non-Gaming Vendor Licensing be forwarded to the Tribal Council Recorder for filing in accordance with Gaming Commission Ordinance Section 6.04 (b).

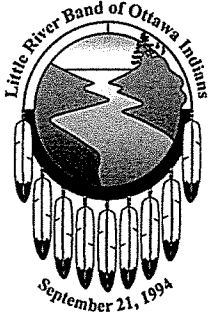
### **Certificate of Adoption**

I, Debra Davis, Secretary of the Gaming Commission do hereby certify that this resolution was adopted on October 15, 2019 by a vote of 5 in favor, 0 opposed, 0 abstentions and 0 absent. This resolution has not been amended or rescinded in any way.

Attest:

  
\_\_\_\_\_  
Debra Davis, Secretary

Distribution: Commission Records  
Tribal Council Liaison



**Little River Band of Ottawa Indians  
Gaming Commission**

2840 Orchard Highway, Suite A  
Manistee, MI 49660

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**Gaming Commission Resolution #GC19-1022-20**

**REPEALING OF GAMING COMMISSION REGULATION #R400-04:GC-05  
CHAPTER 5 – SURVEILLANCE REQUIREMENTS REGULATION**

WHEREAS, the Tribe's status as a federally-recognized Indian tribe was reaffirmed and restored by Congress pursuant to Public Law 103-324, 108 Stat. 2156 (25 U.S.C. § 1300k et seq.); and

WHEREAS, the Tribe adopted a Constitution, pursuant to a vote of the membership on May 27, 1998, which Constitution became effective upon its approval by the Assistant Secretary-Indian Affairs on July 10, 1998; and

WHEREAS, the Tribe adopted amendments to the Constitution on April 26, 2004, which became effective upon approval by the Assistant Secretary-Indian Affairs on May 13, 2004; and

WHEREAS, the Tribe adopted amendments to the Constitution on July 11, 2016 which became effective upon approval by the Assistant Secretary-Indian Affairs on August 24, 2016; and

WHEREAS, the Tribal Council has, pursuant to Gaming Commission Ordinance #04-400-04, created a Gaming Commission and delegated to such Commission the authority to regulate all gaming activities authorized by the Tribe and to enforce all Tribal and federal laws governing the conduct of Tribally-licensed gaming activities; and

WHEREAS, Section 6.04 (a) of the Gaming Commission Ordinance permits the Gaming Commission to promulgate regulations and internal operational procedures of the Gaming Commission and its staff; and

WHEREAS, after a recent review of Gaming Commission Regulation #R400-04:GC-05 – Chapter 5 – Surveillance Requirements Regulation, the National Indian Gaming Commission recommendations for minimum internal controls, and consideration of best practices, it was determined that the requirements in Chapter 5 should be incorporated into Gaming Commission Regulation – Chapter 11 – Class III Tribal Minimum Internal Control Standards and Chapter 5 repealed; and

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Gaming Commission Resolution #GC19-1022-~~20~~

Repealing Gaming Commission Regulation #R400-04:GC-05

Chapter 5 – Surveillance Requirements Regulation

WHEREAS, Gaming Commission Regulation #R400-04:GC-5 – Chapter 5 – Surveillance Requirements Regulation was approved by the Gaming Commission Resolution #GC07-0417-17 on April 17, 2007 and by Tribal Council Resolution #07-0502-227 on May 2, 2007.

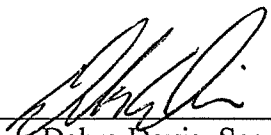
NOW THEREFORE IT IS RESOLVED THAT the Little River Band of Ottawa Indians Gaming Commission hereby rescinds Gaming Commission Resolution #GC07-0417-17 in order to support the repeal of Gaming Commission Regulation #R400-04:GC-05 – Chapter 5 – Surveillance Requirements Regulation; and

IT IS FURTHER RESOLVED THAT this Resolution be forwarded to the Tribal Council Recorder to be placed on the Tribal Council Agenda for approval in accordance with Gaming Commission Ordinance Section 6.04(b) with the request that Tribal Council rescind Tribal Council Resolution #07-0502-227 in order to repeal Gaming Commission Regulation #R400-04:GC-05 – Chapter 5 – Surveillance Requirements Regulation.

#### **Certificate of Adoption**

I, Deb Davis, Secretary of the Little River Band of Ottawa Indians Gaming Commission, do hereby certify that this resolution was adopted on October 22, 2019 by a vote of 3 in favor, 0 opposed, 0 abstentions and 2 absent. This resolution has not been amended or rescinded in any way.

Attest:

  
\_\_\_\_\_  
Debra Davis, Secretary

Distribution: Commission Records  
Tribal Council Liaison



**Gaming Commission**  
2840 Orchard Hwy., Suite A  
Manistee, MI 49660  
Tel: (231) 723-7755 • Fax: (231) 723-7788

## **Gaming Commission Resolution #GC19-1029-21**

### **APPROVAL OF REVISED GAMING COMMISSION REGULATION #R400-04:GC-11 – CHAPTER 11 – CLASS III MINIMUM INTERNAL CONTROL STANDARDS FOR GAMING ENTERPRISES OF THE LITTLE RIVER BAND OF OTTAWA INDIANS**

WHEREAS, the Tribe's status as a federally-recognized Indian tribe was reaffirmed and restored by Congress pursuant to Public Law 103-324, 108 Stat. 2156 (25 U.S.C. § 1300k et seq.); and

WHEREAS, the Tribe adopted a Constitution, pursuant to a vote of the membership on May 27, 1998, which Constitution became effective upon its approval by the Assistant Secretary-Indian Affairs on July 10, 1998; and

WHEREAS, the Tribe adopted amendments to the Constitution on April 26, 2004, which became effective upon approval by the Assistant Secretary-Indian Affairs on May 13, 2004; and

WHEREAS, the Tribe adopted amendments to the Constitution on July 11, 2016 which became effective upon approval by the Assistant Secretary-Indian Affairs on August 24, 2016; and

WHEREAS, the Tribal Council has, pursuant to Gaming Commission Ordinance #04-400-04, created a Gaming Commission and delegated to such Commission the authority to regulate all gaming activities authorized by the Tribe and to enforce all Tribal and federal laws governing the conduct of Tribally-licensed gaming activities; and

WHEREAS, Section 6.04 (a) of the Gaming Commission Ordinance permits the Gaming Commission to promulgate regulations and internal operational procedures of the Gaming Commission and its staff; and

WHEREAS, after a recent review of Gaming Commission Regulation #R400-04:GC-05 – Chapter 5 – Surveillance Requirements, the National Indian Gaming Commission recommendations for minimum internal controls, and consideration of best practices, it was determined that the requirements in Chapter 5 should be incorporated into Gaming Commission Regulation – Chapter 11 – Class III Tribal Minimum Internal Control Standards and Chapter 5 repealed thereafter; and

WHEREAS, revised Gaming Commission Regulation #R400-04:GC-11 – Chapter 11 – Class III Tribal Minimum Internal Control Standards was approved by Gaming Commission Resolution #GC19-0924-17 on September 24, 2019 followed by Tribal Council acceptance by Resolution #19-1009-265 on October 9, 2019; and

WHEREAS, it was discovered after the approval process that the incorrect draft was brought forward and approved by the Gaming Commission and accepted by Tribal Council; and

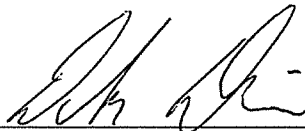
WHEREAS, re-approval of Gaming Commission Regulation #R400-04:GC-11 – Chapter 11 – Class III Tribal Minimum Internal Control Standards is necessary.

NOW THEREFORE IT IS RESOLVED THAT Gaming Commission Regulation #R400-04:GC-11 – Chapter 11 – Class III Tribal Minimum Internal Control Standards be effective and forwarded to the Tribal Council Recorder for filing in accordance with Gaming Commission Ordinance Section 6.04 (b).

#### **Certificate of Adoption**

I, Debra Davis, Secretary of the Gaming Commission do hereby certify that this resolution was adopted on October 29, 2019 by a vote of 4 in favor, 0 opposed, and 0 abstentions and 1 absent. This resolution has not been amended or rescinded in any way.

Attest:



Debra Davis, Secretary

Distribution: Commission Records  
Tribal Council Liaison



**Little River Band of Ottawa Indians**  
**GAMING COMMISSION**  
2840 Orchard Highway, Suite A  
Manistee MI 49660  
(231) 723-7755

**GAMING COMMISSION ORDER #GC19-1015-05**

**GRANTING EXEMPTION FROM VENDOR LICENSING REQUIREMENTS  
FOR LISTED FOOD VENDORS**

WHEREAS, the Tribe's status as a federally-recognized Indian tribe was reaffirmed and restored by Congress pursuant to Public Law 103-324, 108 Stat. 2156 (25 U.S.C. § 1300k et seq.); and

WHEREAS, the Tribe adopted a Constitution, pursuant to a vote of the membership on May 27, 1998, which Constitution became effective upon its approval by the Assistant Secretary-Indian Affairs on July 10, 1998; and

WHEREAS, the Tribe adopted amendments to the Constitution on April 26, 2004, which became effective upon approval by the Assistant Secretary-Indian Affairs on May 13, 2004; and

WHEREAS, the Tribal Council is authorized under Article IV, Section 7(a) to provide for the public health, peace, morals, education and general welfare of the Little River Band and its members; and

WHEREAS, the Tribal Council is authorized under Article IV, Section 7(I) to take action, not inconsistent with the Constitution or Federal law, which is necessary and proper to carry out the sovereign powers of the Tribe; and

WHEREAS, the Tribal Council has in Gaming Commission Ordinance #04-400-04, created a Gaming Commission and delegated to such Commission the authority to regulate all gaming activities authorized by the Tribe and to enforce all Tribal, federal, and applicable state laws governing the conduct of gaming conducted on the Tribe's reservation; and

WHEREAS, in Section 6.04 of Gaming Commission Ordinance, the Gaming Commission is authorized to promulgate rules and regulations as may be necessary to carry out the orderly performance of its duties and powers which shall include; and

WHEREAS, Chapter 19 – Section 3-1 of the Gaming Commission approved regulations states that every person supplying any goods, services, and/or concessions to any gaming enterprise must obtain a Non-Gaming Vendor License unless exempt from licensing requirements pursuant to Section 3-4 or Section 3-5 or meeting the definition of Service Vendor; and

Gaming Commission Order #GC19-1015-<sup>18</sup>  
Granting Exemption from Vendor Licensing Requirements  
for Listed Food Vendors  
Page Two

WHEREAS, Chapter 19 – Section 3-2 of the Gaming Commission approved regulations states that the gaming enterprise shall be responsible for notifying any person with which it is considering conducting business of the licensing requirements prior to contracting with such person; and

WHEREAS, Chapter 19 – Section 3-3 of the Gaming Commission approved regulations states that prior to the purchase of any goods, services, and/or concessions the gaming enterprise shall forward a written “Notice of Intent to Conduct Business” to the Gaming Commission. The “Notice of Intent to Conduct Business” shall describe the goods, services, and/or concessions to be provided by the vendor, together with a good faith estimate of the annual dollar amount of the projected purchases from the vendor. The gaming enterprise may not commit to any binding contracts or business transactions until the vendor has been licensed by the Gaming Commission; and

WHEREAS, Chapter 19 – Section 3-4 (b) of the Gaming Commission approved regulations states that the Gaming Commission may grant special exemptions from vendor licensing requirements for persons or businesses providing professional services or unique services. Persons or businesses that may qualify for special exemptions are those in the following categories: persons or businesses from which the gaming enterprise purchases advertising (billboard companies, trade magazines and newspapers); advertising agencies providing artistic or creative services; and persons or businesses making isolated (single item/event) sales or purchases of goods or services that do not impact gaming activity; and

WHEREAS, Chapter 19 – Section 3-5 of the Gaming Commission approved regulations states that the gaming enterprise must submit a request for exemption from the licensing requirements, including documentation supporting the vendor is highly regulated or supporting documentation how the vendor qualifies for a special exemption. The gaming enterprise shall forward a written “Notice of Intent to Conduct Business” to the Gaming Commission. The “Notice of Intent to Conduct Business” shall describe the goods, services, and/or concessions to be provided by the vendor, together with a good faith estimate of the annual dollar amount of the projected purchases from the vendor; and

WHEREAS, Chapter 19 – Section 3-6 of the Gaming Commission approved regulations states that the gaming enterprise is prohibited from entering into any contract until the vendor has been exempted by the Gaming Commission. Vendors granted an exemption by the Gaming Commission shall be required to provide a completed Conflict of Interest Disclosure in a form satisfactory to the Gaming Commission prior to the commencement of business with the gaming enterprise; and

Gaming Commission Order #GC19-1015-08  
Granting Exemption from Vendor Licensing Requirements  
for Listed Food Vendors  
Page Three

WHEREAS, the gaming enterprise has requested exemption from the vendor licensing requirements for the following food vendors who are regulated or licensed by the U.S. Food and Drug Administration (FDA) and the U.S. Department of Agriculture (USDA):

1. VKV, Inc. d/b/a Tolman's Wholesale Meats
2. Superior Foods Company
3. The Distribution Group, Inc. d/b/a Van Eerden Food Service
4. Sysco Food Service of Grand Rapids, LLC
5. US Foods
6. JOS Sanders, Inc.
7. SOFO Foods of Ohio, LLC
8. Dawn Foods – Detroit Distribution
9. Atlas Wholesale Foods
10. Reinhart Foodservice
11. Lipari Foods
12. Sherwood Food Distributors

NOW THEREFORE IT IS THE ORDER of the Little River Band of Ottawa Indians Gaming Commission that the listed vendors shall be exempted from the licensing requirements for purposes of providing food related services for the Little River Casino Resort. This exemption is valid once the Gaming Commission is in receipt of the Conflict of Interest Disclosure form between the Little River Casino Resort and the vendor per Chapter 19 – Non-Gaming Vendor Licensing – Section 3-6.

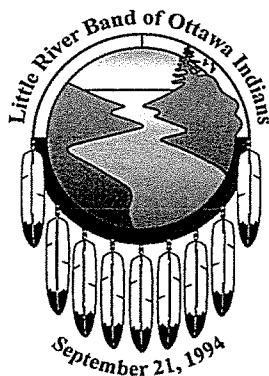
**Certificate of Adoption**

I, Debra Davis, Secretary of the Little River Band of Ottawa Indians Gaming Commission do hereby certify that this order was approved on October 15, 2019 by a vote of 5 in favor, 0 opposed, and 0 abstentions and 0 absent. This order has not been amended or rescinded in any way.

Attest:

  
\_\_\_\_\_  
Debra Davis, Secretary

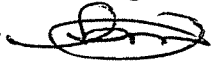
Distribution: Commission Records  
Little River Casino Resort  
Tribal Council Recorder



**Little River Band of Ottawa Indians**  
**Gaming Commission**  
2840 Orchard Highway, Suite A  
Manistee, MI 49660  
Tel: (231) 723-7755 • Fax: (231) 723-7788

# Memo

Aáníípiísh Epiídek (To): Little River Band of Ottawa Indians Gaming Commission

Binjíbidek (From): Kelly Maser, Executive Director 

Maánda Naásaáp (cc):

Naángwa (Date): November 1, 2019

Maánda Nji (Re): Administrative and Licensing – October 2019 Monthly Report

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- 60 licenses processed – initial applications and renewals (Gaming and Non-Gaming)
- 82 applications/files/investigations reviewed for authorization of approval – initial applications and renewals (Gaming and Non-Gaming)
- 19 interviews conducted for new employee license applicants
- 4 sets of fingerprints submitted
- National Indian Gaming Commission (NIGC) Notices (Executive Director)
  - 3 Notice of Results (NOR) prepared and processed
  - 5 Licensing Determinations prepared and processed
  - 5 Investigative Reports prepared and processed
- 3 Non-Gaming Employee License denied (confidential information)
- 1 Show Cause Hearing packet prepared and presented to the Gaming Commission
- No patron complaints received. (Executive Director)
- 3 Vendor licenses processed (Gaming and Non-Gaming)
- 4 Renewal applications sent to vendors (Gaming and Non-Gaming)
- 1 Initial application sent to prospective new vendor (Non-Gaming)
- Non-Gaming Vendor License Applications received, reviewed and investigation conducted
  - 1 Corporate History Disclosure Forms
  - 2 Personal History Disclosure Forms
- Gaming Vendor License Applications received and reviewed
  - 2 Corporate History Disclosure Forms
  - 5 Personal History Disclosure Forms
- 6 investigations reviewed for authorization of approval – initial applications and renewals (Gaming and Non-Gaming)
- 9 Gaming Commission meeting agendas prepared
- 2 Gaming Commission Resolution drafted
- 2 Gaming Commission Orders drafted
- 3 Tribal Council Resolution drafted
- 3 Tribal Council agenda submission processed
- 1 Gaming Commission monthly report compiled and submitted to Tribal Council