

Policy on Status of Gaming Regulatory Commission Employees

Purpose: This policy is adopted by Tribal Council to clarify the status of gaming regulatory employees and Gaming Regulatory Commission budget management. This policy is not intended and shall not be construed to interfere with the Gaming Regulatory Commission's responsibility with regard to licensing of casino employees, facilities and gaming vendors.

- I. Budget: Consistent with recommended accounting practice and NIGC consultation, checks and balances require that the Regulatory Commission budget be administered by the tribal governmental administration following administration policies and procedures. The Gaming Regulatory Commission budget shall therefore continue to be administered by and through the Tribal government as with all other Tribal commissions.

- II. Employees: Under the Gaming Regulatory Ordinance, Waganakising Odawak Statute, 2001-02, the regulatory employees in surveillance, licensing and compliance "are not employees of the Enterprise, but of the Tribal Government." To clarify the status of such employees under that section WOS 2001-02 X(E) the gaming regulatory director, and surveillance, compliance and licensing staff are all employees strictly of the Tribal Government. They must pass background checks but are not licensed or supervised by the Gaming Regulatory Commission. The Tribal governmental personnel policies will generally apply to such employees except for specific accommodations to address the scheduling needs of gaming regulation. These employees are directed to supply all information to the Gaming Regulatory Commission through attendance at Commission meetings and other means as is reasonably needed by the Commission to make its licensing determinations for casino employees, facilities, and gaming vendors