

**Waganakising Odawak**  
Little Traverse Bay Bands of Odawa Indians  
**Frank Ettawageshik, Tribal Chairman**  
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**LTBB MINIMUM INTERNAL CONTROL STANDARDS AMENDMENTS  
REG WOS 2005-06-042907-005**

## **Section 1 - Definitions**

Complimentary means a service or item provided at no cost, or at a reduced cost, to a customer. This does not include non-gaming items made available to all Tribal Citizens, all Gaming Operation Employees, all LTBB Government Employees, or attendees at a conference or training session.

## **Section 3 - Currency Reporting Transactions**

### **A. Requirements for Casino Management**

1. The LTBB Gaming Operation shall comply with the Bank Secrecy Act, BSA (Title 31) and all applicable standards set forth by the US Department of Treasury or its designee (FINCEN and IRS) and establish reporting policies and procedures.
2. The LTBB Gaming Operation shall have established training programs to insure the adherence to all BSA reporting requirements as may be promulgated under the BSA by FINCEN and IRS
3. The LTBB Gaming Operation shall determine the hours for the gaming day to ensure proper reporting.
4. Copies of all Suspicious Activity Reports shall be forwarded to Gaming Regulatory.
5. The LTBB Gaming Operation shall ensure that BSA (Title 31) training is conducted for all new hires and on a bi-annual basis thereafter. These training records shall be made available to the Regulatory Department upon request.

## B. Requirements for all Departments

1. The Bank Secrecy Act contains certain record keeping and reporting requirements for the casino.
2. The LTBB Gaming Operation shall comply with all reporting requirements set by the Bank Secrecy Act.
3. The LTBB Gaming Operation shall make every effort to prevent circumvention of these reporting requirements by a gaming patron. Therefore, the casino will identify currency transactions in excess of \$2,500 and record them on a Multiple Transactions Log (MTL) by individual patron.

### CERTIFICATION

As Chairperson, I certify that I approve of these Amendments to the Tribal Minimum Internal Control Standards.

Date: 2-15-2008

  
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Frank Ettawageshik, Tribal Chairperson

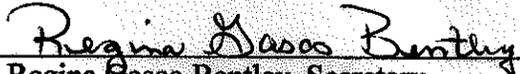
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As the Legislative Leader and Tribal Council Secretary, we certify that these Amendments to the Tribal Minimum Control Standards were approved by the Tribal Council of the Little Traverse Bay Bands of Odawa Indians at a regular meeting of the Tribal Council held on 2-17-08 at which a quorum was present, by a vote of 7 in favor, 0 opposed, 1 abstentions, and 1 absent.

Date: 2/19/08

  
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Beatrice A. Law, Legislative Leader

Date: 2-17-08

  
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Regina Gasco Bentley, Secretary

