APR - 4 2008

Andrew W. Baldwin
Baldwin & Crocker, P.C.
P.O. Box 1229
Lander, WY 82520-1229

RE: Gaming Ordinance Amendment

Dear Mr. Baldwin:

This letter responds to your request on behalf of the Northern Arapaho Tribe for the National Indian Gaming Commission (NIGC) to review and approve the Tribe's amendment to its gaming ordinance. The amendment to the gaming ordinance was adopted by the Northern Arapaho Business Council Resolution 2008-9884. This proposed amendment makes three changes:

(1) The Secretarial Procedures require that before the Tribe may offer a new Class III game for play, it must notify NIGC of applicable internal controls, employee training, game rules, etc. The Procedures require that this be done at least 60 days before play begins, unless the Tribe and NIGC agree to a shorter period. The Northern Arapaho Gaming Authority and the NIGC staff agree that 30 days is sufficient for this notification and the ordinance has been amended accordingly.

(2) The maximum term of a gaming license is extended from 12 months to 24, though the Northern Arapaho Gaming Agency retains authority to impose shorter periods for specific types of licenses.

(3) Gaming employees must have a license. Non-gaming employees are not licensed but must have a work permit if they work at any facility where authorized gaming occurs or is supervised or administered (i.e. a cashier at a convenience store that has slot

machines). Under the previous ordinance, the Tribal Gaming Commission (TGC) could not issue a work permit to a person with any felony conviction. The proposed amendment allows the TGC to issue a work permit to those with felony convictions if they pass a suitability determination and the TGC finds that issuance would not pose a risk to the integrity of the gaming operation. The requirements for suitability determinations related to gaming licenses remain unchanged.

This letter constitutes approval under the Indian Gaming Regulatory Act (IGRA), 25 U.S.C. § 2701 *et seq.*, of this amendment to the Tribe's gaming ordinance. Thank you for submitting the amendment for review and approval. If you have any questions, please contact Staff Attorney Jennifer Ward at (202) 418-9814.

Sincerely,

Philip N. Hogen
Chairman

RESOLUTION ENACTING
AMENDMENTS TO THE NORTHERN ARAPAHO GAMING CODE
NORTHERN ARAPAHO BUSINESS COUNCIL
WIND RIVER RESERVATION
ETHETE, WYOMING

RESOLUTION NO. 2008-9884

WHEREAS, the Northern Arapaho Business Council is the duly elected governing body of the Northern Arapaho Tribe; and

WHEREAS, the development and proper regulation of tribal gaming as a form of economic development is of utmost importance to the Northern Arapaho Tribe and its members; and

WHEREAS, the Northern Arapaho Business Council enacted the Gaming Code of the Northern Arapaho Tribe in 1995 and has enacted certain amendments thereto from time to time and the same have been approved by the National Indian Gaming Commission; and

WHEREAS, certain amendments to the Northern Arapaho Gaming Code, attached hereto, would improve the Code and its regulation of tribal gaming and would benefit the Northern Arapaho Tribe and the gaming public; and

WHEREAS, approval of the attached amendments by the National Indian Gaming Commission would be in the best interests of the Northern Arapaho Tribe and the gaming public;

NOW, THEREFORE, BE IT RESOLVED, that the Northern Arapaho Business Council hereby approves and enacts the attached amendments to the Gaming Code of the Northern Arapaho Tribe, *effective on the date said amendments are approved by the National Indian Gaming Commission*; and

BE IT FINALLY RESOLVED, that the Chairman is authorized and directed to sign this resolution and that the Northern Arapaho Business Council hereby requests prompt approval of said amendments to the Gaming Code by the National Indian Gaming Commission.

CERTIFICATION

The undersigned, as Chairman of the Northern Arapaho Business Council, hereby certifies that the Northern Arapaho Business Council consists of six (6) members and that four (4) members were present constituting a quorum, at a duly called meeting of the Northern Arapaho Business Council held on January 15, 2008, and that the foregoing resolution was adopted by a vote of four (4) members FOR, zero (0) members AGAINST, Chairman voting, and that the foregoing resolution has not been rescinded or amended in any way.

DONE AT ETHETE, WYOMING, THIS 15th DAY OF JANUARY, 2008.

Harvey P. Spoonhunter, Co-Chairman
Northern Arapaho Business Council

ATTEST:

Susan Johnston, Secretary
Northern Arapaho Business Council