NATIONAL
INDIAN
GAMING
COMMISSION

September 20, 1999

Sherry Cordova
Chairperson, Cocopah Indian Tribe
Cocopah Tribal Office
Country 15th & Avenue G
Somerton, AZ 85350

Dear Ms. Cordova:

This letter responds to your request for National Indian Gaming Commission (NIGC) review and approval of the Cocopah Indian Tribe's amendment to the Cocopah Tribal Gaming Ordinance, received by the NIGC on July 6, 1999, (resubmitted September 20, 1999, due to an incorrect section reference). The original ordinance was approved by the Chairman on February 24, 1994. This letter constitutes such approval of the ordinance amendment under the Indian Gaming Regulatory Act (IGRA).

Thank you for submitting the amended ordinance of the Cocopah Indian Tribe for review and approval. The NIGC staff and I look forward to working with you and the Tribe in implementing the IGRA.

Sincerely yours,

Montie R. Deer
Chairman

1441 L STREET, N.W. 9TH FLOOR WASHINGTON, D.C. 20005 TEL.: 202-632-7003 FAX: 202-632-7066

RESOLUTION NUMBER CT-99- 26
OF THE GOVERNING BODY OF THE COCOPAH TRIBE
OF THE COCOPAH RESERVATION

A RESOLUTION OF THE COCOPAH INDIAN TRIBE TO CORRECT AN AMENDMENT TO THE COCOPAH TRIBAL GAMING ORDINANCE

WHEREAS: The Cocopah Tribe attempted to amend the Tribal Gaming Ordinance by action of the Tribal Council dated January 29, 1998: and,

WHEREAS: Said amendment incorrectly referenced title, section number and paragraph number of the Ordinance and,

NOW THEREFORE BE IT RESOLVED, That the Cocopah Tribal Council is restating and readopting correctly said amendment of The Cocopah Tribal Gaming Ordinance. (Attachment I).

* * * * * * * * * * * * *CERTIFICATION* * * * * * * * * * * *

The foregoing resolution was adopted by the Cocopah Tribal Council at a special meeting held on September 20, 1999 with a quorum present by a vote of 3 For and 0 Against, and 0 Abstaining.

ATTEST:

Sherry Cordova, Chairwoman

Mr. Paul Soto, Secretary

AMENDMENT
TO
COCOPAH TRIBAL GAMING ORDINANCE

The Cocopah Tribal Gaming Ordinance, for which notice of approval by the Chairman of the National Indian Gaming Commission was published in the Federal Register on April 15, 1994 is hereby amended as follows:

> Section 7 (b) of the Ordinance, Powers and Duties of Commission is hereby amended by adding a new subsection (xvi) which states as follows:
>
> (xvi) The Commission is empowered to detain persons who may be involved in illegal acts in or around the Gaming Facility for the purpose of notifying appropriate law enforcement authorities.

In all other respects, the Cocopah Tribal Gaming Ordinance shall remain in full force and effect.

COCOPAH TRIBAL GAMING ORDINANCE

SECTION 1. STATEMENT OF POLICY. It is the purpose of this ordinance to provide for the sound regulation of all gaming activities on lands within the jurisdiction of the Cocopah Indian Tribe, in order to protect the public interest in the integrity of such gaming activities, to prevent improper or unlawful conduct in the course of such gaming activities, to strengthen tribal self-government and to promote economic self-sufficiency of the Cocopah Indian Tribe.

SECTION 2. DEFINITIONS. For purposes of this Ordinance:

(a) "Act" means the Indian Gaming Regulatory Act, Pub.L. 100-497, 25 U.S.C. §§2701 et seq. and 18 U.S.C. §§ 1166-1168.

(b) "Chairman" means the Chairman of the Cocopah Tribal Gaming Commission established by this Ordinance.

(c) "Class II gaming" means Class II gaming as defined in accordance with the Act, 25 U.S.C. §2703(7)(A).

(d) "Class III gaming" means all forms of gaming that are not Class I gaming or Class II gaming as respectively defined in 25 U.S.C. § 2703 (6) and (7) and the regulations promulgated to clarify such provisions of the Act.

(e) "Commission" means the Cocopah Tribal Gaming Commission established by this Ordinance, and has the same meaning as "Tribal Gaming Office" under the Compact.

(f) "Compact" means the Tribal-State Compact between the Cocopah Indian Tribe and the State of Arizona.

(g) "Electronic Game of Chance" means a microprocessor-controlled electronic device which allows a player to play games of chance, some of which are affected by skill, which device is activated by the insertion of a token, coin or currency, or by the use of a credit, and which awards game credits, cash, tokens, or replays, or a written statement of the player's accumulated credits, which written statements are redeemable for cash. Game play may be displayed by:

(i) Video facsimile; or

(ii) Mechanical rotating reels whereby the software of the device predetermines the stop positions and the presence, or lack thereof, of a winning combination and pay-out, if any.

(h) "Executive Director" means the Executive Director of the Cocopah Tribal Gaming Commission established pursuant to this Ordinance.

(i) "Gaming Employee" means a gaming employee as defined in the Compact, and includes primary management officials and key employees of the Gaming Operation.

(j) "Gaming Facility" means the building, room or rooms or that portion of a room in which Class II gaming or Class III gaming authorized under the Compact is conducted on the Cocopah Reservation.

(k) "Gaming Operation" means the enterprise owned by the Tribe on Tribal lands for the conduct of the Class III gaming authorized by the Compact.

(l) "Gaming Services" means the providing of any goods, services or concessions by contract to the Tribe directly in connection with the operation of Class III gaming in a gaming facility in an amount in excess of ten thousand dollars ($10,000) monthly except for professional, legal or accounting services. No contract may be broken up into parts for the purpose of avoiding this definition and any requirement of licensure or certification contained in the Compact.

(m) "National Indian Gaming Commission" means the National Indian Gaming Commission established pursuant to 25 U.S.C. §2704.

(n) "Net Revenues" means gross revenues of a Class III gaming activity less amounts paid out as, or paid for, prizes and total operating expenses including debt service but excluding management fees paid to a management contractor within the meaning of 25 U.S.C. §2711(c).

(o) "Ordinance" means this Cocopah Tribal Gaming Ordinance.

(p) "State" means the State of Arizona, its authorized officials, agents and representatives.

(q) "State Gaming Agency" means the agency of the State as the Governor may from time to time designate by written notice to the Tribe as the state agency primarily responsible for oversight of the Class III gaming as authorized by this Compact.

(r) "Tribe" means the Cocopah Indian Tribe, its authorized officials, agents and representatives.

SECTION 3. ADOPTION OF COMPACT. The Compact is hereby incorporated within and enacted as an integral part of this Ordinance with respect to all forms of Class III gaming, and the Compact including the Appendices thereto is incorporated and made a part of this Ordinance as if set forth in full herein; provided, however, that nothing in the adoption of the Compact herein shall be deemed to affect the operation by the Tribe of any Class II gaming, whether conducted within or without the gaming facilities, or to confer upon the State any jurisdiction over such Class II gaming conducted by the Tribe on its Reservation.

SECTION 4. AUTHORIZATION FOR GAMING ACTIVITIES.

(a) Forms of Class III gaming authorized. The Tribe may conduct or operate all forms of Class III gaming authorized under the Compact.

(b) Authority for Class II gaming. In addition to the forms of Class III gaming authorized pursuant to section 4(a) hereof, the Tribe shall be authorized to conduct all forms of Class II gaming on the Reservation, including without limitation any form of bingo (whether or not electronic, computer, or other technologic aids are used in connection therewith), pull-tabs, lotto, punch boards, tip jars, instant bingo, and other games similar to bingo so long as played at the same location as bingo.

SECTION 5. COMPLIANCE WITH THE ACT. This Ordinance shall be construed in a manner which conforms to the Act in all respects, and if inconsistent with the Act in any manner the provisions of the Act shall govern.

(a) Limitation on gaming operations. In compliance with 25 U.S.C. §2710(b)(2)(A), the Tribe shall have the sole proprietary interest in and responsibility for the conduct of any gaming activity on the Reservation; provided, however, that nothing herein shall (i) preclude the Tribe from entering into a Management Contract as authorized under 25 U.S.C. §2711; or (ii) interfere with the exercise by any secured party of its rights under any collateral lease, leasehold mortgage or other financing agreement with the Tribe to enforce its security interests in the premises on which such gaming activities may be conducted, or to enforce its rights against revenues of the Tribe from its gaming activities for the purpose of repayment of the debt obligations of the Tribe to such secured party in accordance with the provisions of such agreements.

(b) Application of net revenues. In compliance with 25 U.S.C. §2710(b)(2) and (3), net revenues from any gaming activity are not to be used for purposes other than:

(i) to fund tribal government operations or programs;

(ii) to provide for the general welfare of the Tribe and its members;

(iii) to promote tribal economic development;

(iv) to donate to charitable organizations;

(v) to help fund operations of local government agencies, or

(vi) any other purposes permitted under the Act.

(c) Annual audit. In compliance with 25 U.S.C. §§2710(b)(2)(C) and (D), the Gaming Operation shall be subject to an audit by independent certified public accountants, not less than annually, and copies of the annual audit shall be provided to the National Indian Gaming Commission. All contracts for supplies, services, or concessions for a contract amount in excess of $25,000 annually (except contracts for professional legal or accounting services) relating to Class II or Class III gaming shall be subject to such audits.

(d) Public safety standards. In compliance with 25 U.S.C. §2710(b)(2)(E), the construction and maintenance of any Gaming Facilities, and the operation of gaming activities, shall be conducted in a manner which adequately protects the environment and the public health and safety and for that purpose shall comply with the requirements of the Compact and all other applicable health, safety and environmental standards enacted by the Tribe.

(e) Background investigations and licensing. In compliance with 25 U.S.C. §2710(b)(2)(F):

(i) All Class III gaming employees, as defined in the Compact, as well as all primary management officials, key employees and principals of the Class III Gaming Operation, shall be subject to the background investigation and licensing requirements of this Ordinance and the Compact, as set forth in the Compact, which include requirements for initial background

investigations and ongoing review for all gaming employees. The Tribe shall notify the National Indian Gaming Commission of the results of the licensing process for its primary management officials and key employees in accordance with such regulations or procedures as the National Indian Gaming Commission may establish.

(ii) All Class II gaming employees who are not subject to background investigations as gaming employees pursuant to the Compact shall be required to obtain a license as a gaming employee from the Commission established pursuant to this Ordinance, and for that purpose the Commission shall conduct background investigations of all such employees and shall deny or revoke such licenses for any employee whose prior activities, criminal record, if any, or reputation, habits and associations pose a threat to the public interest or to the effective regulation of gaming, or create or enhance the dangers of unsuitable, unfair, or illegal practices and methods and activities in the conduct of gaming. The Commission

shall notify the National Indian Gaming Commission of the results of its background investigation for the primary management officials and key employees of its Class II gaming operations who are not licensed as gaming employees pursuant to the Compact, in accordance with such regulations or procedures as the National Indian Gaming Commission may establish.

(iii) Before issuing a license to a gaming employee, the Commission shall forward the results of the appropriate background investigation to the National Indian Gaming Commission in such form as shall be required by the National Indian Gaming Commission.

(iv) If the Commission determines, on the basis of the background investigation conducted under subsection (i) and such other information as it may obtain, that the applicant is qualified for a gaming employee license, the Commission may, but shall not be required to issue such license. The Commission, at its sole discretion, may impose any qualifications to such license it deems appropriate, or may

refuse to issue such license despite an applicant's qualifications.

(v) All persons who are not gaming employees but work at any facility where authorized gaming occurs or is supervised or administered, must obtain a non-gaming work permit. Such work permits shall be issued upon determining that the employee is not a threat to the effective regulation of gaming and creates no risk or enhances no danger of unfair or illegal practices, methods or activities in the conduct of gaming on the reservation. All applicants for work permits shall provide the information required in the Compact.

(vi) Any person or entity proposing to sell or lease Electronic Games of Chance, other Gaming Devices or Gaming Services to the Tribe shall be licensed to do so. The procedures for such license and the standards therefor are the same as those applicable to gaming employees herein, except that if applicant is a corporation, trust or partnership, applications must be made by any person or

entity holding 10% or more of any beneficial or legal interest therein.

SECTION 6. PENALTIES. Any individual who violates any provision of this Ordinance, including the provisions of the Compact incorporated herein, shall be subject to civil penalties including exclusion from employment by any Tribal Gaming Operation, denial or revocation of a tribal gaming license, exclusion from attendance at any Tribal Gaming Facility, exclusion from the Reservation if a non-member of the Tribe, or, with respect to any person subject to the jurisdiction of the Tribe to impose such fines, a fine of not more than $500.00 for each such violation. The Commission established pursuant to this Ordinance shall have the jurisdiction to impose any such penalties on any person within the jurisdiction of the Tribe to impose such penalties.

SECTION 7. TRIBAL GAMING COMMISSION.

(a) Establishment of Commission. There shall be established a Cocopah Tribal Gaming Commission consisting of a chairman and two other members who shall be appointed by the Tribal Chairman with the advice and consent of the Tribal Council, at least two of whom shall be members of the Tribe, but none of whom shall be employees of the Gaming Operation, and who shall each serve for a term of three years commencing on the date of their appointment; provided, that the initial members so appointed shall serve for terms deemed to commence on June 1, 1992, and one of the initial members appointed shall be designated to serve for an initial term of one year and one of the initial members appointed

shall be designated to serve for an initial term of two years. The members of the Commission shall serve on a part time basis and the compensation of members of the Commission shall be established by the Tribal Council. Members of the Commission may be removed for cause by a three-fourths (3/4) vote of the members of the Tribal Council then in office. Vacancies in the Commission may be filled by appointment by the Tribal Chairman with the advice and consent of the Tribal Council. No member or employee of the Commission shall participate as a player in any gaming activity conducted by the Tribe.

(b) Powers and duties of Commission. The Commission shall have the following powers and duties:

(i) The Commission shall have primary responsibility for oversight of the tribal Gaming Operation to assure the integrity of such operation and shall, for that purpose, employ non-uniformed inspectors who may be present in all gaming facilities during all hours of operation and who shall be under the sole supervision of the Commission and not under the supervision of any management employees of the Tribal Gaming Operation. Such inspectors shall have unfettered access to all areas of the Gaming Facilities at all times, and personnel employed by the Gaming

Operation shall for such purposes provide such inspectors access to locked and secure areas of the gaming facilities in accordance with the standards of operation and management promulgated pursuant to the Compact. Such inspectors shall report to the Commission regarding any failure by the Gaming Operation to comply with any of the provisions of the Compact or this Ordinance and any other applicable laws and ordinances. Inspectors assigned by the Commission may also receive consumer complaints within the gaming facilities and shall assist in seeking voluntary resolution of such complaints. Inspectors appointed by the Commission shall be licensed as gaming employees in accordance with the Compact.

(ii) The Commission may on its own initiative investigate any aspect of the Gaming Operation in order to protect the public interest in the integrity of such gaming activities and to prevent improper or unlawful conduct in the course of such gaming activities, and shall investigate any report of a failure of the Gaming Operation to comply with the provisions

of the Compact or this Ordinance and may require the Gaming Operation to take any corrective action deemed necessary by the Commission upon such terms and conditions as the Commission may determine appropriate. The Commission may compel any person employed by or doing business with the Gaming Operation to appear before it and to provide such information, documents or other materials as may be in their possession to assist in any such investigation.

(iii) The Commission shall carry out each of the responsibilities and duties set forth for the Tribal Gaming Agency in the Compact.

(iv) The Commission shall prepare a plan for the protection of public safety and the physical security of patrons in each of its gaming facilities, setting forth the respective responsibilities of the Commission, the security department of the Gaming Operation, any Tribal police agency, and if appropriate, any State or local policy agency.

(v) The Commission shall review and approve floor plans and surveillance systems for each gaming facility and may confer with the State Gaming Agency or other organizations regarding the adequacy of such plans and systems.

(vi) The Commission may promulgate, review and revise (as necessary) regulations to govern the operation and management of the Gaming Operation in accordance with the Compact.

(vii) The Commission may issue and revoke licenses for Class III gaming employees in accordance with section 4(e)(i) of this Ordinance.

(viii) The Commission may issue and revoke licenses for Class II gaming employees in accordance with section 4(e)(ii) of this Ordinance.

(ix) The Commission shall establish a list of persons barred from the gaming facilities because their criminal history or association with career offenders or career offender organizations poses a threat to the integrity of the gaming activities of the Tribe.

(x) The Commission shall promulgate, review and revise (as necessary) the Technical Standards and rules of each game of chance operated by the Tribe pursuant to the Compact and shall in accordance with the provisions of the Compact notify the State Gaming Agency of such rules and of any change in such rules.

(xi) The Commission shall enforce the health and safety standards applicable to the Gaming Facilities in accordance with section 5(d) of this Ordinance. Prior to the opening of any facility for Class III gaming the Gaming Operation shall obtain a certificate of compliance from the Commission relating to the Class III Gaming Facilities. The Commission shall issue a certificate of compliance to the Gaming Operation upon a determination that the Gaming Facilities comply with such standards.

(xii) The Commission may impose penalties for violations of this Ordinance or the Compact in accordance with section 6 of this Ordinance.

(xiii) The Commission may in the name of the Tribe bring any civil action or criminal complaint

in the courts of the Tribe, State or the United States to enforce the provisions of this Ordinance, the Act or the Compact or to enjoin or otherwise prevent any violation of this Ordinance, the Act or the Compact, occurring on the Reservation.

(xiv) The Commission may receive any complaint from an employee of the Gaming Operation or any member of the public who is or claims to be adversely affected by an act or omission of the Gaming Operation or any employee thereof which is asserted to violate this Ordinance or the Compact, and may impose such remedial action as it deems appropriate to bring the Gaming Operation into compliance with such provisions. The Commission may for this purpose, in its sole discretion, conduct a hearing and receive evidence with regard to such complaint if it deems an evidentiary proceeding useful in the resolution of such complaint.

(xv) The Commission shall adopt an annual operating budget which shall be subject to the approval of the Tribal Council and may in accordance

with said budget employ such staff from time to time as it deems necessary to fulfill its responsibilities under this Ordinance, and may retain legal counsel, consultants and other professional services including investigative services to assist the Commission with respect to any of the issues over which the Commission exercises jurisdiction. The expenses of the Commission in accordance with such budget shall be assessed against the Gaming Operation and the Gaming Operation shall pay such assessments to the Tribe.

(c) Chairman. The Chairman of the Commission or any other member of the Commission acting in the absence of the Chairman may, whenever he deems it necessary to protect the public interest in the integrity of Tribal gaming operations, issue in the name of the Commission any order which the Commission has the power to issue, to the Gaming Operation or to any employee or contractor of the Gaming Operation or to any other person within the jurisdiction of the Tribe, to take any action or cease and desist from any action as may be required to protect to the public interest; provided, that such order shall be subject to review by the Commission at its earliest opportunity, whereupon it may be confirmed or vacated by the Commission.

(d) Executive Director. The Commission shall appoint an individual to serve as Executive Director of the Commission to

administer its responsibilities as necessary and to oversee inspectors appointed by the Commission as well as such other staff as the Commission may from time to time employ. The Executive Director shall be responsible for coordination of the functions of the Commission with the State Gaming Agency and other federal, state and local agencies as necessary. The Chairman may request the Executive Director to conduct a preliminary investigation and render a recommendation to the Commission with respect to the grant or denial of any license, the imposition of any penalty, the investigation of any complaint, or any other action within the jurisdiction of the Commission. The Executive Director shall have the power, in the name of the Commission, to conduct any hearing, investigation or inquiry, compel the production of any information or documents, and otherwise exercise the investigatory powers of the Commission, which the Commission may exercise under this Ordinance.

(e) Procedures of the Commission.

(i) Regular meetings of the Commission may be held upon such notice, or without notice, and at such time and place as shall from time to time be fixed by the Commission. Unless otherwise specified by the Commission, no notice of such regular meetings shall be necessary.

(ii) Special meetings of the Commission may be called by the Chairman or the Executive

Director. The person or persons calling the special meeting shall fix the time and place thereof. Neither the business to be transacted at, nor the purpose of, any regular or special meeting of the Commission need to be specified in the notice of the meeting.

(iii) At any meeting of the Commission, a majority of the members then in office shall constitute a quorum for the transaction of business. The vote of a majority of the members present at a meeting at which a quorum is present shall be the act of the Commission. The Chairman shall preside at all meetings of the Commission unless the Chairman designates another member to preside in his absence.

(iv) Any action required or permitted to be taken at a meeting of the Commission may be taken without a meeting if all of the members sign written consents setting forth the action taken or to be taken, at any time before or after the intended effective date of such action. Such consents shall be filed with the minutes of the Commission, and shall have the

same effect as a unanimous vote or resolution of the Commission at a legal meeting thereof.

(v) Members of the Commission may participate in a meeting of the Commission by means of conference telephone or similar communications equipment by means of which all persons participating in the meeting can hear each other, and participation in a meeting in such matter by any member who does not object at the beginning of such meeting to the holding thereof in such manner shall constitute presence in person at such meeting.

(vi) No action of the Commission to impose a penalty pursuant to section 6 of this Ordinance, or to revoke a license for a gaming employee previously issued by the Commission, shall be valid unless the person affected is given at least seven days' notice of the proposed action and the opportunity to appear and be heard before the Commission, either in person or through a representative or legal counsel, and to submit such evidence as the Commission deems relevant to the matter at issue; provided, that if the Commission deems

it necessary to protect the public interest in the integrity of the gaming activities, the Commission may take such action with immediate effect as it deems required, and shall thereupon provide notice and an opportunity to be heard to the affected person as soon as is reasonably practicable following such action. Any person who is denied an initial gaming employee license or who is barred from the gaming facilities by action of the Commission may request a hearing before the Commission by written request submitted within thirty days following receipt of notice of the action of the Commission, and the Commission shall thereupon afford an opportunity to appear and be heard before the Commission, either in person or through a representative or legal counsel, and to submit such evidence as the Commission deems relevant to the matter at issue and thereafter the Commission shall either affirm or reconsider its decision. Any hearing conducted under this sub-section may at the direction of the Commission be conducted by the Executive Director or by one or more members of the Commission designated by the Commission for that purpose.

(vii) The Commission may adopt such additional procedures and rules as it deems necessary or convenient to govern its affairs and which are consistent with this Ordinance and the Compact.

SECTION 8. STANDARDS OF OPERATION AND MANAGEMENT.

(a) Class III gaming. The initial technical standards of operation and management for Class III gaming adopted in accordance with the Compact shall be those set forth as Appendix A of the Compact.

(b) Class II gaming. The Commission may adopt standards of operation and management for Class II gaming, and pending such adoption, may direct the Gaming Operation to comply with such standards as the Commission may determine necessary to protect the integrity of such Class II games.

SECTION 9. PROHIBITED ACTS.

It shall be a violation of this Ordinance for any person to:

(a) Conduct or participate in any Class II or Class III Gaming Operation on the Reservation other than at the Gaming Facilities.

(b) Receive, distribute, apply or divert any property, funds, proceeds or other assets of the Gaming Operation to the benefit of any individual or any other person except as authorized by this Ordinance, the Compact or the Act.

(c) Tamper with any equipment used in the conduct of tribal gaming operations with the intent to cause any person to win or lose any wager other than in accordance with the publicly-announced rules of such gaming operations.

(d) Do any other act in connection with the conduct of the tribal gaming operations with the intent to affect the outcome of any wager other than in accordance with the publicly-announced rules of such gaming operations.

(e) To alter or misrepresent the outcome or other event on which wagers have been made after the outcome is made sure but before it is revealed to the players.

(f) To place, increase or decrease a bet or to determine the course of play after acquiring knowledge, not available to all players, of the outcome of the game or any event that affects the outcome of the game or which is the subject of the bet or to aid anyone in acquiring such knowledge for the purpose of placing, increasing or decreasing a bet or determining the course of play contingent upon that event or outcome.

(g) To claim, collect or take, or attempt to claim, collect or take, money or anything of value in or from a gaming device, with intent to defraud, without having made a wager thereon, or to claim, collect or take an amount greater than the amount won.

(h) To place or increase a bet after acquiring knowledge of the outcome of the game or other event which is the subject of the bet, including past-posting and pressing bets.

(i) To reduce the amount wagered or cancel the bet after acquiring knowledge of the outcome of the game or other event which is the subject of the bet, including pinching bets.

(j) To manipulate, with the intent to cheat, any component of an electronic game of chance or gaming device in a manner contrary to the designed and normal operational purpose for the component, including, but not limited to manipulating a gaming device, with knowledge that the manipulation affects the outcome of the game or with knowledge of any event that affects the outcome of the game.

(k) Knowingly to use other than coins or tokens approved by the Commission or other lawful coin, legal tender of the United States of America, or to use a coin not of the same denomination as the coin intended to be used in the gaming device.

(l) To possess, with the intent to use, any device to assist in projecting the outcome of the game, in keeping track of the cards played, in analyzing the probability of the occurrence of an event relating to the game, or in analyzing the strategy for playing or betting to be used in the game.

(m) To use any device or means to cheat, or to possess any such device while at the Gaming Facility.

(n) Knowingly to entice or induce another to go to any place where gaming is being conducted or operated in violation of the provisions of this Compact or the Tribal ordinances, with the intent that the other person play or participate in that gaming.

. . . . . .

CERTIFICATION

The foregoing Cocopah Tribal Gaming Ordinance was duly adopted at a meeting of the Cocopah Tribal Council held on this 30th day of July, 1992, at which 4 members were present constituting the required quorum, by a vote of 3 for, 0 against, 0 abstaining.

Chairman,

Attest: Secretary,

PNN00C53