JAN 1 0 2008

Chief J. Allan, Chairman
Coeur d'Alene Tribe
P.O. Box 408
Plummer, ID 83851

RE: Gaming Ordinance Amendment regarding Guest Dispute Resolution Procedures

Dear Chief Allan:

This letter responds to your request on behalf of the Coeur d'Alene 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 Coeur d'Alene Tribal Council via Resolution No. 310(2007). This proposed amendment establishes Guest Dispute Resolution Procedures.

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

OCT 19 2007

LAW AND ORDER/LEGAL AFFAIRS
AMEND TRIBAL CODE, CHAPTER 30,
TO ADD TO SECTION 30-5.01 SECTION (Q)
AND ADD SECTION 30-15.01 **CD'A RESOLUTION 310 (2007)**

WHEREAS, the Coeur d'Alene Tribal Council has been empowered to act for and on behalf of the Coeur d'Alene Tribe pursuant to the revised Constitution and By-Laws adopted by the Coeur d'Alene Tribe by referendum November 10, 1984, and approved by the Secretary of the Interior, Bureau of Indian Affairs, December 21, 1984; and

WHEREAS, the Coeur d'Alene Tribal Council has a responsibility for Tribal Health, Welfare, economic development and natural resources; and

WHEREAS, the Coeur d'Alene Tribal Council has the authority to change its Code regarding disputes between gaming enterprises operating under Chapter 30 and the customers of those gaming enterprises; and

NOW THEREFORE, BE IT RESOLVED, that the Coeur d'Alene Tribal Council hereby approves the Amendment to the Tribal Code, **Chapter 30, Coeur d'Alene Tribal Charitable Gaming Code, to add to Section 30-5.01 section (Q) and to add new: Section 30-15.01 Guest Dispute Resolution Procedures** to read as follows:

30-5.01 Powers and Duties of the Board
Insert:

(Q) Ensure that procedures governing the resolution of disputes, complaints and concerns raised by guests or customers of the gaming enterprise are promulgated and implemented.

Insert:
30-15.01 Guest Dispute Resolution Procedures

All gaming enterprises licensed and regulated by the Board shall create and implement procedures for resolving disputes, complaints and concerns raised by guests of the gaming enterprise.

BE IT FUTHER RESOLVED, that the Amendment to the Tribal Code shall take effect upon the signing of the Resolution.

CERTIFICATION

The foregoing resolution was adopted at a meeting of the Coeur d'Alene Tribal Council held at the Tribal Administration Building, 850 A Street, Plummer, Idaho on August 23,2007, with the required quorum present by a vote of 5 FOR 0 AGAINST

Chief J. Allan

CHIEF J. ALLAN, CHAIRMAN
COEUR D'ALENE TRIBAL COUNCIL

Norma J. Louie

NORMA J. LOUIE, SECRETARY
COEUR D'ALENE TRIBAL COUNCIL

GUEST DISPUTE RESOLUTION PROCEDURE[1]

1. The CCRH strives for unparalleled guest service at all times and intends for these procedures to ensure that all guest disputes are fairly and successfully resolved.

2. All guest disputes are to be investigated by the manager in charge of the department in which the dispute occurs at the time of the dispute (the "Investigating Manager"). The Investigating Manager may interview employees, guests, or vendors, and may consult with any departments necessary to allow him or her to develop an accurate narrative and chronology of events.

3. Procedure for Investigating Machine Complaints

    a. Ask the guest to go with you to a quiet area, off the casino floor, where you both can talk about the dispute.

    b. The first and most important step in resolving any guest complaint is to listen carefully to the guest's complaint. Careful and active listening to the guest's complaint includes just that: listening. Allow the guest to tell you exactly what their complaint is, and don't interrupt their complaint.

    c. When the guest has told you exactly what their complaint is, in as much detail as they want, simply verify with the guest the elements of their complaint by asking if you understand their complaint.

    d. When the guest has fully explained his or her complaint to you, ask the guest to write down the facts of the situation as they see them. This will allow both sides to understand exactly what the complaint is about, and will allow for easy reference at a later date.

    e. The Investigating Manager will then take the following steps:

        i. Call Information Services ("IS") personnel to verify that the ACRES system was functioning properly at the time of the dispute.

        ii. Call the on-duty Bench Technician to verify that machine was not malfunctioning. If a malfunction is found, remind the guest that, as stated on the face of all gaming machines, "malfunctions void all pays and plays." Proceed to restore the guest's credits on the machine to the amount present when the machine malfunctioned.

        iii. Propose a resolution to the guest which is fair and adequate in light of the facts of the situation, both as understood by the guest and as understood by the Investigating Manager.

[1] Effective September 21, 2007.

b. As with all complaints, active listening is crucial to understanding disagreement and resolving issues in a reasonable and fair manner. Active listening means just that: listening. Don't interrupt the guest, and don't propose a resolution until you have heard all that the guest has to say. This may require that you endure the guest's attempts to vent their emotions for a short time. This is acceptable, within reason. If a guest seems violent or hostile or makes threats, contact Security immediately.

c. Another part of active listening is to verify that you've heard the guest properly. This not only allows you to ensure that you understand what was said, but also informs the guest that you were actually listening to their complaint. Repeat back the elements of the guest's complaint, so that they understand immediately that you're listening to what they have to say.

d. Once the Investigating Manager understands the complaint, have the guest write down a short statement of the facts of the dispute as they understand them. Often, a complaint boils down to a misunderstanding of the facts of a situation.

e. Then, conduct the investigation into the dispute by all means necessary to establish the correct sequence of events, including Surveillance video reviews and interviews of employees, guests, or vendors. The Investigating Manager may also consult with any departments necessary to enable the Investigating Manager to determine the facts.

f. Once this investigation is completed, the Investigating Manager will propose a resolution of the dispute to the guest which is proper in light of the facts of the situation. If the guest does not agree with the proposed resolution, the Investigating Manager will refer the guest to the manager at the next highest level of authority.

g. When the dispute is resolved, the Investigating Manager must create a brief written summary of the dispute and the measures taken to resolve it for inclusion in the department's files.

5. This policy will be available to guests at each cage and at the VIP desk. These areas will prominently display the following sign:

> The gaming operations of the Coeur d'Alene Casino Resort Hotel are regulated by the Coeur d'Alene Tribe's Charitable Gaming Board.
>
> A copy of the Casino's guest dispute resolution procedures is available for inspection upon request.