



# OFFICE OF THE GAMING COMMISSIONER

The Chickasaw Nation

902 Arlington, PMB 228 • Ada, Oklahoma 74821

(580) 310-0570 • Fax (580) 310-0571

July 19, 2013

Hon. Tracie Stevens  
Chairwoman  
National Indian Gaming Commission  
1441 L Street NW, Suite 9100  
Washington, DC 2005

Re: Approved Alternate Minimum Standard

Dear Chairwoman Stevens:

In accordance with 543.5 of the MICS, I am writing to inform you that an approved alternate minimum standard for section 543.17 of the MICS has been approved. The revised TICS and request to use an alternate minimum standard were approved electronically by former Commissioner Matthew Morgan. Please find the approved version of TICS along with an explanation of how the alternate standard achieves a level of security and integrity sufficient to accomplish the purpose of the standard it is to replace.

Should you have any questions, or if any further information is needed, please feel free to contact my office at (580) 310-0570

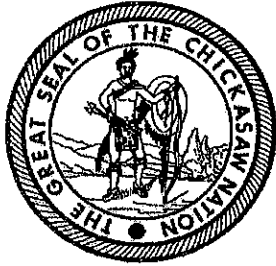
Sincerely,

A handwritten signature in black ink, appearing to read "D. Scott Colbert".

D. Scott Colbert  
Gaming Commissioner

8h :S W 4Z TCO CDE

12/19/13  
11:58 AM  
03/19/13



**Chickasaw Nation**  
**Department of Commerce**

Office: 2020 E. Lonnie Abbott Blvd. / Ada, OK 74820  
Phone: 580-421-9500

Bill Anoatubby  
Governor

Bill Lance  
Secretary of  
Commerce

May 3, 2013

*Sent Via MKS Integrity*

Mr. Matthew Morgan  
Gaming Commissioner  
1500 North Country Club  
Ada, OK 74820

Re: Request for approval to utilize an alternate minimum standard as stated in the NIGC MICS at 25 CFR 543.5.

Dear Mr. Morgan

The CNDC respectfully requests approval to follow an alternate minimum standard instead of the two 543.17 standards listed below:

*543.17(f)(14)(iv) The cage/vault agent receiving the transferred drop proceeds must sign the count sheet attesting to the verification of the total received, and thereby assume accountability of the drop proceeds, ending the count.*

*543.17(g)(16)(iv) The cage/vault agent receiving the transferred drop proceeds must sign the count sheet attesting to the verification of the total received, and thereby assuming accountability of the drop proceeds, and ending the count.*

Currently the CNDC utilizes a true blind count, whereby the vault has absolutely no knowledge of the soft count totals, which complies with the MICS. CNDC does not currently pass the count sheet through to the vault for a signature at any time. CNDC currently passes the soft count funds/drop proceeds through to the vault after the soft count; then the vault performs an independent count and signs the Daily Activity Report (DAR) to attest to the accuracy of the drop proceeds received and counted. CNDC believes the two standards above are less efficient than our current processes and offer less control.

CNDC's current processes achieve the same level of security and integrity as the standards set forth in the two 543.17 standards referenced above. Below is our explanation of how that level of security and integrity is accomplished as required in 543.5:

1. Our current processes provide the same blind/independent count but do not offer the soft count totals to the vault at any time. Immediately following the soft count, the funds are

passed to the vault for verification and either a soft count employee or a security officer delivers the count sheets to accounting. The vault personnel will perform their count of the drop funds and call accounting with the verification totals. At this point, the two blind counts of the drop funds are confirmed by an accounting employee who either approves the funds to be added to the vault inventory or tells the vault they need to recount.

2. Our current processes do not require a soft count employee to remain in the soft count room until the vault has counted/verified the drop proceeds for their signature on the count sheet. The 543.17 standards state that a vault agent will sign the count sheet "attesting to the verification of the total received" which requires that the vault count the funds before signing the soft count sheet. This process will subsequently require that a soft count employee remain in the count room with the count sheet to obtain the vault signature and then deliver the count sheets to accounting. This is less efficient than our current process.

CNDC's proposed TICS language follows:

543.17(f)(14)(iv) The cage/vault agent receiving the transferred drop proceeds must sign the count sheet attesting to the verification of the total received, and thereby assume accountability of the drop proceeds, ending the count.

*TICS: Alternatively, CNDC will continue to follow the controls of a blind count in soft count and vault. The count sheet will not be passed to the vault as stated in (i) and (ii) above. The count team will pass the counted drop funds to the vault thus ending the count. The vault shall verify the drop proceeds received and certify by signature on the DAR as to the accuracy of those proceeds.*

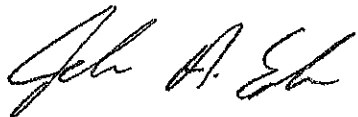
543.17(g)(16)(iv) The cage/vault agent receiving the transferred drop proceeds must sign the count sheet attesting to the verification of the total received, and thereby assuming accountability of the drop proceeds, and ending the count.

*TICS: Alternatively, CNDC will continue to follow the controls of a blind count in soft count and vault. The count sheet will not be passed to the vault as stated in (i) and (ii) above. The count team will pass the counted drop funds to the vault thus ending the count. The vault shall verify the drop proceeds received and certify by signature on the DAR as to the accuracy of those proceeds.*

Please consider our request and provide your response.

If I may be of any assistance please let me know.

Respectfully,

A handwritten signature in black ink, appearing to read "John A. Eck". The signature is fluid and cursive, with the first letters of each name being capitalized and prominent.

John A. Eck, C.F.E.

Assistant Manager of Gaming Compliance

JAE/jae

cc. Bill Lance  
Clint Chadwick  
Pat Neeley  
Jeanna Gregory