



Saint Regis Mohawk Tribe

Chief Eric Thompson
Chief Beverly Cook
Chief Michael Conners
Sub-Chief Cheryl Jacobs
Sub-Chief Shelley Jacobs
Sub-Chief Agnes Jacobs

Ohiarihkó:wa/July 1, 2017

National Indian Gaming Commission
Department of the Interior
1849 C Street NW
Mail Stop #1621
Washington, D.C. 20240

Via e-mail to: [Vannice Doulou@nigc.gov](mailto:Vannice.Doulou@nigc.gov)
Original to follow

Tekwanonhwerá:ton | Greetings Chairman Chaudhuri, Vice Chair Isom-Clause and Associate Commissioner Simermeyer,

As the elected officials of the Saint Regis Mohawk Tribe, please accept this as our official written comments on the following National Indian Gaming Commission consultation topics:

1. Draft Guidance in accordance with Tribal comments received for voluntary non-binding Class III minimum internal control standards (MICS) and regulatory changes as a result of the 2015-16 consultation;
2. Rural Outreach;
3. Developing a Strong Tribal Workforce through Training;
4. Management Contract Regulations and Procedures;
5. Technical Standards for Mobile Gaming Devices; and
6. Fees.

Class III MICS

We support the issuance of Class III MICS for tribes who wish to utilize them and the NIGC proposal to suspend 25 C.F.R. Part 542 with the clarify statement that the regulation is not enforceable. The St. Regis Mohawk Tribal Gaming Commission has reviewed the draft and made comments on the following:

Section 3(e)(4) amend to read "A card and *dice* control log".

Section 3(l) The following standards must apply if foreign currency is *exchanged* in the pit.

The Akwesasne Mohawk Casino Resort offers dual currency, US and Canadian, at specific table games and the foreign currency is not exchanges as we have Canadian denominated chips. The proposed regulations should be applicable if foreign currency is exchanged for US dollars in the table game pit.

Rural Outreach

We believe the NIGC can best deliver technical assistance and training to smaller rural operations by having a greater presence at such small rural locations. By splitting the St. Paul regional office into two distinct regions is a start. We also believe the best teacher is audits. Our philosophy is by learning from audit findings. We use these findings as a tool to measure our operational and regulatory effectiveness. When there are findings, it is a learning opportunity to correct the issue and either improve training, education, or procedures, or maybe all three, to ensure the issue does not occur on subsequent audits. We encourage the NIGC to start with a full audit

of the operations in question, then provide assistance to the tribe in how to effect meaningful change to correct the issue. Often, simply understanding the finding and the importance of correcting it will enable a tribe to move forward towards better compliance. We believe the delivery of audit findings and meaningful education of the findings will assist the NIGC in improving these tribal operations. The key is to view such audits as not being punitive but educational.

Training

The St. Regis Mohawk Tribal Gaming Commission is constantly challenged by technology, and the advancement of technology in gaming. Understanding the technological advancements in gaming, and how to properly regulate them are a prime focus of our Gaming Commission. Therefore, we encourage the NIGC to provide more advanced, in depth training focused on current technology and also keep tribes apprised of what technology is coming in the future.

Management Contracts

We do not utilize a management contract, and have not since 2000. We do not have any comments on this subject.

Mobile Gaming Devices

We support the issuance of regulations focusing on mobile gaming devices and this is one of the areas where our Tribal Gaming Commission is focusing their efforts on. The St. Regis Mohawk Tribal Gaming Commission does not have any suggestions or changes to your proposed section 547.13.


Fees

The Saint Regis Mohawk Tribe supports the NIGC's proposed changes in fees regulations found at 25 C.F.R. Part 514.


The Tribal Council of the Saint Regis Mohawk Tribe appreciates the opportunity to make written comments on the consultation topics of the National Indian Gaming Commission.

Skén:nen | In peace,

THE SAINT REGIS MOHAWK TRIBAL COUNCIL


Eric Thompson
Tribal Chief


Beverly Cook
Tribal Chief


Michael Conners
Tribal Chief