

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

NATIONAL INDIAN GAMING COMMISSION
REGULATION REVIEW
TRIBAL MEETING
at
ONEIDA CASINO
2020 Airport Drive
Green Bay, Wisconsin

JUNE 7, 2012

Reported by: Annick M. Trimble, RPR

(Start time: 9:05 a.m.)

1 TRANSCRIPT OF PROCEEDINGS

2 MR. LITTLE: My name is Dan Little.
3 I'm the associate commissioner with the
4 National Indian Gaming Commission. I want to
5 welcome you all to our regulatory review on
6 Group 3, which includes Part 547 and Part 543,
7 the class of minimum technical standards group.
8 I'm here on behalf of chairwoman, Tracie
9 Stevens, and vice-chairman, Steffani Cochran,
10 who send their regards and wish everyone the
11 best of luck and send their hellos.

12 I'm also joined by some NIGC staff that I
13 wanted to point out. Helping check us in here
14 today was Ben Buck. He's from the -- from the
15 regional office. Linda Durbin, she is, I
16 think, out and about in the hallway. Michael
17 Hoenig, the office of general counsel. Paxton
18 Myers, the chief of staff. Nimish Purohit is
19 over here. He's with our division of
20 compliance. Who else have we got? Jennifer
21 Ward, who's also with our office of general
22 counsel. Rest West, he's with our division of
23 compliance, and then Sarah Murray who is the
24 counselor to the chairwoman.

25 MS. MURRAY: Good morning.

1 MR. LITTLE: I think I got everybody.
2 But before we get started I want to turn the
3 meeting over to chairman Ed Delgado with the
4 Oneida Tribe of Wisconsin to make some opening
5 remarks. Chairman?

6 AUDIENCE MEMBER: No, I am not the
7 chairman. Is this on?

8 MR. LITTLE: Did he have to step out?

9 (A discussion held off the record.)

10 AUDIENCE MEMBER: Well, in either
11 case I think I can talk loud enough.
12 Unfortunately our chairman had another
13 obligation. He was here this morning and he
14 wanted to welcome everybody. Welcome,
15 everybody. Thank you for coming, and on behalf
16 of the business committee of the Oneida Tribe
17 of Indians and the Oneida Tribe of Indians he
18 just wanted to say thank you and welcome, so he
19 apologizes he had to step out, but he just
20 asked me to make a couple remarks.

21 MR. LITTLE: That's unfortunate,
22 because I did get a chance to see the chairman
23 a couple seconds ago, so on behalf of the
24 commission we're very proud to be here in
25 Oneida Country, and we're very happy and glad

1 that the tribe allowed us to come here today,
2 so thank you very much.

3 You know, when this commission got
4 together, it's been about two years now, we
5 kind of established four major priorities, and
6 those were our consultation and relationship
7 building, training technical assistance, HC
8 operations, and the last one is regulatory
9 review, and basically everything that we've
10 done over the last two years has basically been
11 focused on those as our priorities.

12 The last priority, the regulatory review,
13 is what we're here to talk about today. We set
14 out in the fall of 2010 with a notice of
15 inquiry and basically sent out to the tribes
16 requesting information on what regulations that
17 the -- of the NIGC needs to be looked at and
18 how they should be reviewed and what time
19 frame. From that we did consultation in the
20 winter of 2011 and in April of 2011 we
21 published our Notice of Regulatory Review,
22 which included about 14 regulations that we
23 determined were of importance that needed to be
24 looked at.

25 Today we're going to talk about the Parts

1 547, the technical standards for Class II
2 gaming, and Part 543, the MICS for Class II
3 gaming.

4 Just kind of a little recap on some other
5 regulations that we've already reviewed. Part
6 514, the fees, that's actually went final.
7 523, the repeal, went final also. And then we
8 have the Notice for Proposed Rulemaking for
9 Parts 542, 518, 547, 556, 558, 559, 571, 573,
10 and then 580 through 585 of the appeals.

11 We're very proud of the work that -- that
12 the commission has done. Always need to
13 recognize our staff because they work very hard
14 on it while we had some members of the
15 commission get to go on and, you know, talk
16 about all these regulations that we've gone to
17 either final rule or proposed rule. It's
18 actually the brilliant staff that does all the
19 work and, you know, helps bring us to where we
20 are today. But there's also a flip side of
21 that coin, and that is the tribes, and we're
22 very grateful to all the input, all the
23 information, all the time and effort that the
24 tribes have spent to come out, provide
25 information, provide comments, and to really

1 make this a two-way dialog, and that's
2 particularly why we're here today, is on June 1
3 we did publish a Notice of Proposed Rulemaking
4 for these two parts. This is on the heels of a
5 discussion draft that was -- that was published
6 in mid March and the comment period ended in,
7 at the end of May, and from that we received
8 over -- over 100 comments, good comments, and
9 you know, as many of you might may know, prior
10 to coming on the commission I worked for the
11 Mashantucket Pequot for over a decade, and so I
12 was kind of on the other side. I was on the
13 side of the tribes when it came down to, you
14 know, following the NIGC, following the
15 rulemaking process, and you know, I knew a lot
16 of times tribes, you know, were a very good
17 core group, got together and provided comments.
18 What I really enjoyed about the discussion
19 draft that we just went through was that just
20 the time and the energy and the effort that the
21 tribes put in to provide detailed, really
22 helpful comments that when we review them and
23 we use greatly when we put together these
24 Notice of Proposed Rules, so I want to thank
25 all the tribes, I want to thank the National

1 Indian Gaming Association for all the efforts
2 they did kind of leading up that effort, and a
3 lot of the other regional gaming associations
4 out there that did a lot of hard work for their
5 tribes, and you know, at the end of the day our
6 goal here is to -- is to get a regulation that,
7 while everybody may not be happy with it, it's
8 what works best, and we do that through good
9 consultation and good communication, so I want
10 to thank all the tribes for participating
11 throughout the whole process and not only for
12 being here today.

13 We're going to start off with the
14 PowerPoint presentation here, and just kind of
15 a couple recap things here, you know, these --
16 this consultation is meetings between tribal
17 government and the federal government, you
18 know, only tribes, tribal associations
19 designees can participate, and these meetings
20 are not open to the public.

21 One of the things that I know we've talked
22 about, I know the chairwoman has talked about
23 extensively, is our commitment to Executive
24 Order 13,175. This is consultation and
25 coordination with Indian tribal governments.

1 This is very important to us, because like I
2 said earlier, when I worked for a tribe and,
3 you know, I was -- I was on -- I'm basically on
4 your side of the table, often times we kind of
5 felt that there wasn't good consultation, and
6 consultation means you listen to the tribes and
7 you understand what their issues are, and then
8 the commission must take that information when
9 making their deliberations and making policy
10 changes, so this commission is very committed
11 to Executive Order 13,175 and all the parts of
12 it, number one, encouraging Indian tribes to
13 develop their own policies to achieve program
14 objectives, very, very important, you know,
15 when -- where possible defer to Indian tribes
16 to establish standards, and then the third one
17 is in determining whether to establish Federal
18 standards, consult with tribal officials as for
19 the need, and that's what I think we've done
20 and we're very proud of that.

21 As, you know, you probably heard this
22 before and it's worth repeating, the commission
23 is committed to a clear and transparent
24 process. We have a transcriptionist here. As
25 soon as the recording or the record is

1 available it'll go up on our line so -- or
2 online, so you can review it at our website at
3 nigc.gov.

4 All the comments that are submitted,
5 written comments that are submitted, are
6 online. You can probably see those if you have
7 reviewed for the discussion draft. Those are
8 online, and then we'll do the same thing with
9 the Notice of Proposed Rulemaking, and I think
10 most importantly is every comment will be
11 reviewed, and I said it very seriously, we read
12 every comment that came, and I have a big book
13 on my desk that lists every single comment that
14 was submitted for the discussion draft. If a
15 tribe or an organization takes the time to
16 write out a letter I think it's only -- it's a
17 right thing to do for the commission to
18 actually read them, so we do read them, we do
19 review them. I know the staff reviews them, so
20 they're very important, so we want to thank you
21 again on that.

22 And the other thing is any proposed rule
23 or final rule will include a summary of the
24 comments, and you'll see that in the two Notice
25 of Proposed Rules we've got extensive comments,

1 and it gives you an idea of our thinking and
2 logic behind making decisions that we made, so
3 just want to thank you once again for those
4 thoughtful and considerate comments.

5 The next slide, basically, like I said
6 earlier, we're going to talk about Group 3 of
7 the regulatory review agenda, and those include
8 Part 547, minimum standard technical standards
9 for gaming equipment used in with the play of
10 Class II games, and then Part 543, minimum
11 internal control standards for Class II gaming.

12 Now, after we go through the agenda here
13 I'm going to turn it over Michael Hoenig and
14 he's going to talk about Part 547 and then Jen
15 Ward is going to talk about Part 543.

16 Before we get started I would like, and I
17 think we can get one of the staff to grab a
18 mike, I just want to have everybody go around
19 the room and introduce themselves, just a name,
20 organization that you represent, it would be
21 helpful.

22 MR. CHAPMAN: My name is Daniel
23 Chapman, Lac du Flambeau, gaming commission
24 director.

25 MS. HAZEN: My name is Yolanda Hazen.

1 I'm from Lac Vieux, and I'm gaming review
2 commissioner.

3 MR. CHAPMAN: Good morning. My
4 name's Duane Chapman. I'm from Lac du
5 Flambeau, internal auditor.

6 MR. EMERSON: David Emerson. I'm the
7 slot director here at Oneida.

8 MR. HENZLEY: Harvey Henzley, Oneida
9 tribal internal.

10 MS. MARTIROSYAN: Good morning. My
11 name is Marina Martirosyan, gaming and
12 compliance specialist.

13 MS. HAWIKA: Ann Hawika, gaming
14 compliance specialist for Oneida.

15 MR. SUJERAK: Good morning. My name
16 a Chad Sujerak. (Phonetic.) I'm from Oneida,
17 gaming compliance specialist.

18 MR. SCHREIBER: Good morning. James
19 Schreiber, Forest County Potawatomi gaming
20 commission compliance.

21 MR. GEORGE: Good morning. I'm
22 George Junior, gaming commission chairman for
23 the Potawatomi.

24 MR. BASINA: Good morning. Milo
25 Basina, compliance for Forest County

1 Potawatomi.

2 MR. DECORAH: Morning. Joseph
3 Decorah from the Ho-Chunk Nation Gaming
4 Commission.

5 MR. WHITE: Ron White, Lac Vieux
6 Desert, gaming regulator.

7 MR. TAHSUDA: John Tahsuda, Oklahoma
8 Gaming Association.

9 MR. REYNOLDS: Bill Reynolds, St.
10 Croix Gaming Commission.

11 MR. CORNELIUS: William Cornelius,
12 attorney for the Oneida gaming commission.

13 MS. VANCHISM: Tammy VanChism, I work
14 for the Oneida gaming commission.

15 MR MCLESTER: Eric McLester, gaming
16 management at Oneida.

17 MR. OLUJIC: Good morning, again.
18 Jack Olujic, assistant general manager of
19 finance for Oneida Casino.

20 MR. ORCUTT: Morning. I'm Rob
21 Orcutt, attorney for the Oneida Casino.

22 MS. DURBIN: I'm just staff. Linda
23 Durbin, NIGC.

24 MR. BUCK: Ben Buck, compliance
25 officer, NIGC.

1 MR. GILES: Jason Giles, National
2 Gaming Association.

3 MS. HER MANY HORSES: Danielle Her
4 Many Horses, National Indian Gaming
5 Association.

6 MR. STEVENS: Good morning,
7 everybody, I'm Ernie Stevens, and I want to say
8 welcome to all of you folks for coming here
9 today. I think it's very important and
10 somewhat historic to be able to sit here, put
11 our minds together, and on behalf of my Oneida
12 relatives and team here I'm very proud of what
13 we've done here as it relates to compliance,
14 and I could go forever and tell you about the
15 first gaming commission and, you know, talk
16 about Eric's dad, talk about my dad and so many
17 great things have happened, but the fact, if we
18 fast-forward and I keep you all morning and
19 keep this mike all morning, is that this is
20 a -- like our brothers and sisters in the north
21 and throughout Wisconsin, this area, they're
22 very a fluid, hardworking operation here and
23 compliance has been our priority from Day 1,
24 and Eric and I are and our parents, our dads,
25 were the ones that started the, you know, put

1 the hammer down from the start and we look out
2 for our gaming operations and overseeing the
3 compliance and all the team.

4 I think my father created the -- I was --
5 I got to be on the council, I got to be the
6 chairman of the audit committee, you know, I
7 don't barely work the adding machine, you know,
8 but because my dad started it and my son is
9 chairman of the committee now, he's a tribal
10 councilman, so we we're very proud of what we
11 have here at Oneida. We're very excited to
12 have all our guests and our relatives here, but
13 most importantly to have the National Gaming
14 Commission here. It's real vital so we can be
15 able to project our voice to you and vice
16 versa, so on behalf of us in this region we
17 take great pride, not just in compliance, but
18 the overall service to our customers and most
19 importantly to our community. As I've said
20 many times to Senator McCain, Senator Jordan,
21 that our compliance, our integrity, everything
22 we do starts from within the heart of our
23 community, and that's where we sit right now,
24 so welcome to you.

25 MR. LITTLE: Thank you, Chairman

1 Stevens. It's always nice to come up here, and
2 I probably should have mentioned earlier, boy,
3 it's a nice hotel here. I really enjoy it. I
4 think the last time I was here about four years
5 ago before I came on the commission and
6 actually kind of missed those preregulator
7 days, because boy, this casino's got some hot
8 craps tables, so -- but unfortunately I had to
9 take a look at it last light. Actually, a nice
10 crowd in the casino, so it was actually great
11 to see that this casino is doing well and got a
12 wonderful facility and you've got a great
13 hotel, so I really appreciate the
14 accommodations.

15 A couple quick things I just want to -- I
16 want to invite any of the tribal leaders or
17 gaming commissioners to come have a seat at the
18 table. We have seats here for, you know, folks
19 that want to make comments or if you want to
20 have a seat, so I invite you to come up and sit
21 with us.

22 And then the last thing before I turn over
23 to Michael Hoenig is we have an agenda that
24 we're going to try to stick to; however, in
25 past consultations we've gone through the

1 agenda a little rather more quickly. We will
2 work until -- we'll continue along on the
3 agenda until the lunch break. If there's no
4 other comments after lunch we'll come back in
5 the event there was some folks that decide to
6 be here after lunch, but we may end early, so
7 if you're a tribal leader, you have, I know you
8 all have busy schedules, some have traveled
9 long distances, if you only can be here for a
10 short period of time and you've got a prepared
11 statement that you want to either submit to the
12 record, you can do that at any time, and
13 actually, if anyone would like to do that right
14 now, I open the floor up to any prepared
15 statements or comments.

16 Okay. So with that, like I said, if you
17 do have any you can come and you can just come
18 up to the mike at any time, make your
19 statement, and then if you need to, if you need
20 to leave we can certainly understand that, so
21 like I said, so if we move through the agenda
22 quicker than is scheduled we probably will end
23 early, so I just want to make sure everybody
24 has their comments in there, you know, if
25 possible before lunch. We will come back after

1 lunch, but if there's no one, nothing else to
2 cover then we'll probably end, so with that if
3 there's no comments I'll turn over to Michael
4 to continue with the -- with the PowerPoint
5 presentation.

6 MR. HOENIG: Good morning, everybody.
7 My name is Michael Hoenig. I'm with the office
8 of general counsel. As Commissioner Little
9 just said, we're going to talk about 547 and
10 543, the minimum internal control standards and
11 the technical standards. As I go through the
12 PowerPoint if anybody has any questions or
13 comments please feel free to interrupt me, and
14 if I don't see hands go up you can literally
15 interrupt me because I'm looking up there and
16 down at a piece of paper.

17 The vote rules, 547 and 543, were
18 published in the Federal Register on June 1,
19 2012, and I believe the Federal Register link
20 is up on their website, I think that's correct,
21 yes, so you can access it there or you can find
22 it in the Federal Register. The comment period
23 closes on July 31, 2012, so get your comments
24 in by then, and there's instructions in the
25 Federal Register on where to submit comments

1 and how you can submit comments.

2 So let's get into 547. We had issued a,
3 or published a discussion draft some time ago.
4 We reviewed those comments and then based on
5 those comments we put out the Notice of
6 Proposed Rulemaking, so this will talk about,
7 this PowerPoint is going to talk about the
8 changes that have happened from the discussion
9 draft as well as some of the just general
10 changes, the high points of the 547 draft that
11 you'll see, you'll notice.

12 So the first thing to talk about is just
13 the proposed rule generally. It
14 reorganizations the first five sections, so
15 547.1, that's going to stay the same, but 547.2
16 is now the definitions section. We thought it
17 made sense to put all the definitions right up
18 at the front. 547.3 is now the implementation
19 section which talks about how you implement the
20 technical standards. 547.4 is now the rules of
21 general application, so this is kind of the
22 broad rules that are going to apply to
23 everything in the reg. And 547.5 is the
24 general compliance section, so that's going to
25 have all the -- the general compliance parts.

1 That's where you're going to get into the
2 grandfathering and the compliance for all
3 machines.

4 So in the definitions section we made some
5 changes there. There is a new definition for
6 EPROM, which I don't have in front of me.
7 Nimish, can you tell us what an EPROM is,
8 because I can't remember what that stands for.

9 MR. PUROHIT: It's programmable
10 readable media, electronic, so it's a standard,
11 gaming industry standard terminology for
12 government around the casinos, and it's just
13 been put into the class detect standards.

14 MR. HOENIG: Thank you. For some of
15 the more technical stuff I'm going to be
16 turning it over to this guy here.

17 So we also added advertised top prize,
18 audit mode, definitions for enroll and
19 unenroll, which we have comments about that.
20 We reinserted the definition of electrostatic
21 discharge based on public comments. That got
22 dropped somehow, so we made sure it was put
23 back in there since it is used throughout the
24 reg. We amended the definition of
25 electromagnetic interference, also based on

1 some comments that we got. We removed a
2 definition that we had put into the discussion
3 draft. In the discussion draft we had added,
4 we wanted to see what folks would think of a
5 definition for proprietary Class II system
6 component, and then with that we added the term
7 proprietary to the definitions of casual system
8 and voucher system, and I'm going to let Nimish
9 talk a little bit about why we did that and
10 then why we took it back out.

11 MR. PUROHIT: Thanks, Mike. So a
12 little quick little history. I came on board,
13 joined NIGC a little after the first round was
14 drafted in 2008, and we had several questions
15 from then until fairly recently by tribal
16 regulatory authorities and tribal operators
17 asking us that hey, we have a common
18 back-of-the-house system that we're putting in
19 to all these different Class II systems that we
20 have, so you know, your accounting systems,
21 they're all coming back to the house ones, do
22 those back-of-the-house systems need to be
23 tested to these standards, and the answer at
24 that time and now is that they don't because
25 they're just being added on, as an accounting

1 functionality, as a marketing functionality, so
2 what we tried to do with this approach and what
3 I was trying to address were those concerns,
4 that if you have something that is a common
5 back-of-the-house system that does not need to
6 be tested to this, it only needs to be tested
7 to the Tribal Gaming Regulatory Authority's
8 requirements to whatever your specific
9 back-of-the-house system is, so that was kind
10 of the goal and the objective with adding the
11 word proprietary, and then based on the
12 comments we got it was realized that the
13 definition and also the interpretation of that
14 might be taken in other ways, so that's why the
15 commission chose to remove it.

16 MR. HOENIG: Last thing for
17 definitions section is the definition of agent.
18 It does not include a computer systems, and
19 that's kind of been the carryover discussion,
20 that's carried over from the discussion draft.

21 So moving onto 547.3, that is the who is
22 responsible for implementing these standards,
23 so the implementation section. This was moved
24 over from 547.5. It sets out that these are
25 minimum standards, that the Tribal Gaming

1 Regulatory Authorities can implement standards
2 that are stricter. This is just the minimum
3 that has to be done. We -- it still has
4 language in the existing 547, and that was also
5 in the discussion draft, which is no limitation
6 on technology, so you know, this is not meant
7 to limit technology. Only applicable standards
8 apply, so if there is a standard in here that
9 doesn't apply to a particular machine or a
10 particular component it's not applicable so it
11 doesn't need to be tested. And this has no
12 affect on state jurisdiction.

13 Next is 547.4, what are the rules of
14 general application for this part, and this is
15 moved down to 547.5 from 547.5, sets up the
16 fairness standards and what the discussion
17 drafted, and this draft, the Notice for
18 Proposed Rulemaking, also does, was to remove
19 the minimum odds requirement. The current 547
20 that's in effect right now had a minimum odds
21 requirement of 100 million to one; is that
22 right?

23 MR. PUROHIT: Progressive.

24 MR. HOENIG: So that's been taken out
25 and we'll see a little later in a later slide

1 in replace of that, to replace that there is a
2 notification requirement which we'll get to in
3 just a few minutes. This requires the test lab
4 to calculate and to verify the mathematical
5 expectations and report those to the Tribal
6 Gaming Regulatory Authority. That requires the
7 test results to be submitted to the Tribal
8 Gaming Regulatory Authority, but the Tribal
9 Gaming Regulatory Authority may also request
10 and manufacture to submit those mathematical
11 expectations so that they have the actual
12 expectations, not just the test results also.
13 All gaming equipment and software has to be
14 approved by the Tribal Gaming Regulatory
15 Authority before it can go on the floor, and
16 equipment must perform according to design and
17 operating specifications, and this kind of
18 gives the TGRA a -- the ability to make sure
19 that they have those design specifications or
20 those operating specifications so that they can
21 ensure that the machine or the game that
22 they've put on the floor is operating as it was
23 designed to operate.

24 547.5, how does a tribal government or
25 TGRA comply with this part? So the big thing

1 here is the grandfathering provision. In the
2 discussion draft we had made some changes to
3 the grandfathering provision and we got a lot
4 of comments about that. In fact, that was
5 probably the most of any comments we got. What
6 we've done in the proposed rule is just take it
7 back, reset it. The commission decided that it
8 needed some more information before it knew,
9 before it could decide exactly what it wanted
10 to do with the grandfathering provision, so in
11 the Notice of Proposed Rulemaking you'll see
12 it's almost exactly as it is the current 547.
13 There are a few small changes just so it didn't
14 conflict with other parts of the regulation,
15 but with grandfathering the commission is
16 requesting more information to make an informed
17 decision.

18 So you'll see in the Notice of Proposed
19 Rulemaking in the preamble there's some
20 questions set out, how many Class II gaming
21 systems will be affected at the current date
22 that they have to be taken off the floor or
23 brought into compliance is November 10, 2013,
24 and if that current date is extended how many
25 Class II gaming systems will be affected?

1 What will be the regulatory or other
2 impacts of extending the period by three to
3 five years past November 10, 2013 or just
4 removing the time period completely? How many
5 Class II gaming systems could be potentially
6 submitted to labs if the 120-day period is
7 modified, so initially any game that was going
8 to be grandfathered had to be submitted for
9 testing within 120 days of November 8, 2008, so
10 if -- November 10? Thank you. If it wasn't
11 submitted within that 120 days that's it, it
12 couldn't qualify as grandfathered, so if that
13 120-day requirement is lifted or if the
14 commission were to set out a new time period
15 for submission what affect would that have?

16 What would be the regulatory and other
17 impacts of allowing the limited submission
18 period for the systems that did not meet the
19 original deadline? If 547 were amended in this
20 fashion to apply only to modifications what
21 specific impacts would the amendment have on
22 tribal gaming operations? One of the options
23 or one of the possibilities that are discussed
24 in the Notice of Proposed Rulemaking is to
25 require modifications to be brought into

1 compliance instead of requiring the whole
2 machine, so there wouldn't be a time period
3 that a game would, the grandfathering provision
4 would expire, but as modifications are made
5 those modifications have to be compliant.

6 Similarly, what would be the impact if
7 the -- this were required of not only
8 modifications but also repairs and replacements
9 for grandfathered Class II gaming systems, so
10 what impacts would that have on the tribal
11 gaming operation.

12 This 547.5 also amends the test lab
13 certification requirement from the discussion
14 draft based on public comments, test labs must
15 note compliance with standards set forth by the
16 TGRA rather than just being able to quote
17 applicable federal laws and regulations.

18 We got some comments that that was setting
19 a really difficult standard, so now it's just
20 whatever the TGRA requires, that's what it has
21 to be tested to.

22 So there's no substantive changes to
23 Section 547.6, so we're going to skip that and
24 go onto 547.7, which is the technical, the
25 minimum technical hardware standards. The

1 player interface must be labeled with serial
2 number and date of manufacture. This was a
3 change from display, based on public comments.
4 There was some confusion about displayment, did
5 it need to be on the actual display, the
6 machine display, or could it be on the side, so
7 we changed that to say labeled.

8 And it also removes other efforts as to
9 underwriter's laboratory. That's something
10 that we did in the discussion draft and this
11 carried over into this draft.

12 So next is 547.8, what are the minimum
13 technical software standards applicable to
14 Class II gaming systems, so we removed all the
15 references to entertaining displays. That was
16 in the discussion draft, it's been carried over
17 to here. Entertaining displays are not the
18 game. That bingo card is the game and so last
19 game recall, things like that, there's no
20 requirement that the entertaining display be
21 shown.

22 Provides fair changes in rules, but those
23 changes can't be automatic and they have to be
24 disclosed to the player.

25 And then there are no substantive changes

1 to Section 547.9, .10, .11, so we're going to
2 skip those as well and go over to 547.12, what
3 are the minimum technical standards for
4 downloading on the Class II gaming system, so
5 this removes the TGRA authorization requirement
6 for downloads, and I was just talking to Nimish
7 about this, and the reason for that is it's
8 still necessary, but this isn't the place for
9 it, so it's been moved over to the minimum
10 internal control standards, because that's a
11 control.

12 Requires the Class II gaming system to be
13 capable of providing download information, and
14 downloaded software must be capable of being
15 verified by the Class II gaming system. We put
16 in the capable of, these are all testable
17 standards now.

18 547.14, what are the minimum technical
19 standards for electronic random number
20 generators, so I'm going to let Nimish talk
21 about this a little bit, but we've made a
22 change. There was a requirement that it have a
23 specific unbiased algorithm. That's been
24 changed. I'm going to let Nimish talk a little
25 bit about that.

1 MR. PUROHIT: Thanks. Mike was
2 telling me don't get into hieroglyphics today
3 because random number generators are pretty
4 technical, so I'll try not to do that. The
5 requirements in here and what the bias was
6 referring to is in actually addressing that
7 when the initial version of 547 went out in
8 2008 there was a bulletin, 2008-4 or -3, I
9 forget which one, I'm sorry, but there was a
10 bulletin that was subsequently issued that
11 talked about that the bias in there of one in
12 100 million is overly strict and it doesn't
13 necessarily apply to random number generators
14 used in Class II gaming systems for bingo ball
15 draws, and because of that and what the
16 comments that were received and from both
17 experience as someone that used to analyze this
18 when I worked for an independent test lab and
19 also conversations with the mathematicians at
20 the independent test labs, we came up with a
21 general approach which was proposed to the
22 Tribal Advisory Committee and said instead of
23 specifying bias the requirement, which is
24 testable and designable, is that there is a
25 bias in the random number generator for the

1 scaling algorithm, which is if you look at it
2 in context, that's where this is, that it has
3 been reported to the Tribal Regulatory
4 Authority who then makes a decision on whether
5 or not that bias is allowable for their
6 jurisdiction. So that's kind of the approach
7 that we went with. It's not a bias in the
8 random number generator, as many of the
9 comments suggested. It's actually, when you
10 look at it in context, it's a bias for the
11 scaling and the mapping section, so if there is
12 any comments on the specificity of how this is
13 unclear language or ambiguous I will reiterate
14 the Commissioner Little's comments on please
15 let us know how we can specify that.

16 MR. HOENIG: And this is actually in
17 the Notice of Proposed Rulemaking, in our
18 preamble there is -- this is one of the sections
19 where we do ask a very specific question,
20 because some of the comments we got were saying
21 well, that's impossible, we can't report every
22 single bias, and so the question is well, why
23 is this an impossible standard and be more
24 specific, so any information on that is greatly
25 appreciated.

1 In the RNG there's also, or in the
2 section, I should say, there's also mandatory
3 testing for the RNG. Again, this was something
4 that was put into the discussion draft.
5 Through our discussions at the Tribal Advisory
6 Committee it was decided that these are
7 actually mandatory and necessary tests, so they
8 are set up as mandatory. It's the Chi-Square
9 Test, the Runs Test, Serial Correlation Test,
10 and any additional test at the discussion of
11 the TGRA can be mandatory, and then there are
12 also listed in there some optionals tests.

13 No substantive changes to 547.15, so we'll
14 move onto 547.16, the minimum standards for
15 game artwork glass and rules, and earlier I
16 talked about a new notification requirement.
17 This was in the discussion draft that was being
18 carried over to here, and that is the game has
19 to have this additional disclaimer if the odds
20 are above one in 100 million, and there's no
21 odds requirement. It's simply that if the odds
22 of hitting any advertised top prize exceeds 100
23 million to one the player interface must
24 display notification of such. On the
25 discussion draft we had the word continually in

1 there which created some problems, and so we've
2 taken that out. It just has to be -- there has
3 to be a notification at some point in the game.
4 It can be on the rules page, etc. And that's
5 it for 16.

6 Lastly is 547.17, and this is how to --
7 how does a TGRA apply to implement an alternate
8 standard those required by this part, so this
9 used to be called the variance section. When
10 we get to 543 we'll talk a little bit about why
11 that was confusion -- confusing there, since
12 variance was used, I think, two or at least
13 three different ways in 543, so we just made a
14 universal change. Instead of calling it a
15 variance it is an alternate standard. The TGRA
16 must submit the alternate standard within 30
17 days of its approval. The chair then, the
18 chair of the NIGC then has 60 days to approve
19 or object. And we've heard from some of our
20 staff in the field that actually go out and
21 check these things out that sometimes 60 days
22 is more than enough time and sometimes it's not
23 nearly enough time, so the chair has the option
24 to extend that 60 day period, if necessary.

25 No alternate standard may be implemented

1 unless approved by the TGRA or the chairs.
2 There were some comments that were saying we
3 should be able to implement this as soon as
4 it's approved by the TGRA. We agree and the
5 discussion draft and this draft both made clear
6 that the alternate standard can be implemented
7 as soon as it's approved by the TGRA, so the
8 TGRA approves and then it's submitted to the
9 chair.

10 And finally, any appeal of the objection
11 to the alternate standard is going to be
12 included as part of our general fee regs, which
13 are subpart H, and I think those have been, at
14 least they're proposed to have been on the
15 proposed notice as well so you can see how the
16 appeals process works. This used to have its
17 own separate appeals process, which is a little
18 confusing, so in consolidating all the appeals
19 process to make them all uniform that section's
20 been moved there, and that is it for 547, so if
21 there's any questions.

22 MR. LITTLE: Okay. Thanks, Mike and
23 Nimish. Is there any question -- is there any
24 comments that anybody wants to make regarding
25 Part 547? I mean, it can be on any of the

1 sections or anything that we talked about. The
2 commission does understand that these were just
3 published on June 1, so I know many of you may
4 not have had time to, you know, thoroughly, you
5 know, prepare statements or comments, so like I
6 said earlier, the comment period is open ---
7 the comment period is open until July 31.
8 You're more than welcome to submit written
9 comments before that time, and then also
10 there's four other consultations scheduled,
11 Oklahoma City next week and we have Arizona, I
12 think, the last week of this month and then
13 California and Washington state in July, so
14 there will be some other opportunities there.

15 Mike had talked about the grandfathering
16 provision, and I think that it's been the major
17 focal point for a lot of the comments for
18 PowerPoint 547, and we've heard a lot of
19 discussion and if you notice in the discussion,
20 I mean, excuse me, in the Notice of Proposed
21 Rule we asked some specific questions, so if
22 you can review those questions and like we
23 really need to know what is the actual impact
24 of this grandfather sunset provision if it does
25 go into effect next year, what will be the

1 impact, how many systems will be affected, and
2 then, you know, another follow-up question is
3 on the 120-day rule where a tribe would have
4 had to submit a system to the testing lab
5 within 120 days of enactment of this
6 regulation, how many systems and devices were
7 affected that were not brought in, were not
8 tested or not gotten to the testing lab in
9 time, if that was removed. We're just trying
10 to understand what is the actual overall. We
11 did make -- we did request these questions in
12 the past and we never really got a good
13 thorough understanding of what is the actual.
14 We've heard numbers as high as 4 and 6,000, but
15 those weren't something that somebody actually
16 pointed the finger at to say this is the actual
17 impact of this is how many devices or systems
18 are affected, so it would be really helpful to
19 hear about that, because this is important.
20 You know, the commission fully understands the
21 importance of a Class II industry.

22 While many of you do operate Class III
23 facilities we understand that this is important
24 to all tribes regardless on what type of gaming
25 they participate in, and it's important to have

1 a robust Class II industry, so we understand
2 that we want to make sure that whatever we do
3 with these grandfathered games we're not doing
4 something that's going to have an adverse
5 impact or is going to do something that, you
6 know, is not, you know, is not thoroughly
7 thought out or we don't have all the
8 information necessary, so another part of that,
9 the question that we had asked was about the
10 modifications, and we've heard that the current
11 regulation does allow for modifications that
12 are equal to or exceed the standard, and during
13 the discussion draft we had a consultation in
14 Kansas and one of the commenters had said that
15 it was his -- his thought, and I'm taking this
16 from memory, that when they established the
17 five year grandfather sunset provision that I
18 guess the commission felt that the market would
19 have worked its course and the systems would
20 have worked their way through the normal, you
21 know, market demand; however, I'm not sure if
22 the, you know, economic conditions that we've
23 all been through over the last few years was
24 brought into consideration, so we have the
25 systems that are still being used and it is in

1 the minds of many of the tribes that these are
2 still viable gaming devices and systems that
3 they want -- that you want to use, so we want
4 to make sure that if these are -- if we can
5 protect the integrity of the gaming operation
6 and protect the patrons we want to make sure
7 that, you know, you're still all able to use
8 those. However, we want to make sure that, and
9 I think we've heard and I'm actually interested
10 in hearing if there are some certain areas
11 where tribes still have these grandfathered
12 games cannot become fully compliant, you know,
13 I think the commission feels that the end
14 result that we want these systems to become
15 fully compliant, but we want to make sure that
16 there's no undue hard, you know, economic
17 conditions we're creating by systematically
18 just eliminating them after the five -- as the
19 sunset provision comes to a close here next
20 year, so we're really, really interested in
21 hearing from you what is going to be the
22 economic impact, what are the specifics of how
23 many systems will be affected. So if you're
24 using these, any grandfathered games or
25 systems, please, you know, please let us know

1 so we can -- we can have a better
2 understanding.

3 Are there any -- does anyone want to
4 comment on that or any other parts? I know
5 we -- during the discussion drop I think a lot
6 of these, you know, the changes we made to
7 entertaining displays or the odds as far as
8 removing the cap on the odds there was some
9 comments that we submitted that tribes were
10 concerned on how, the discussion drafts, it's
11 here in the Notice of Proposed Rule, will
12 require that the patron be notified or be
13 displayed on the system that the odds could
14 exceed one in 100 million, and there was some
15 concern that well, this would require that all
16 the systems to be retested. Well, currently my
17 understanding there's no -- there should be no
18 systems out there that have odds that exceed
19 one in 100 million, so it would require
20 reprogramming anyway, so that doesn't
21 necessarily going to be a hardship, so we
22 appreciate more comments on that if you have
23 any.

24 Are there any other things? Any of the
25 staff have questions they want to throw out to

1 get folks thinking about or, like I said, you
2 don't necessarily have to speak today. If you,
3 you know, want to take everything in, review
4 all the information. Yes, sir. Could you come
5 up to the microphone and just state your name
6 and the organization you're with?

7 MR. CHAPMAN: Daniel Chapman, Lac du
8 Flambeau. With respect to the -- I haven't had
9 a chance to look at the published, has the
10 manufacturers made comment, any manufacturers
11 made comment to this proposed regulations
12 commission?

13 MR. LITTLE: They've commented on the
14 discussion drafts, and I think, I don't think
15 there's been any substantive comments. I think
16 we got some.

17 MR. PUROHIT: There's one that comes
18 to mine, Commissioner Little, if I may, there
19 is a -- and you can take a look, there's a
20 company called Fortunate. They submitted
21 something, and that was to, from their point of
22 view, because the Class II system also extends
23 to handheld devices, such as your bingo
24 winders, such video devices, etc., so they're
25 asking during the discussion draft when the

1 comments came in that there needs to be some
2 specificity to that, so that's the one that
3 comes right to my mind, and then there was one
4 from the, just expanding on that, by
5 independent test labs that test these
6 manufacturers' products as well, but besides
7 those two I can't think of any other specific
8 ones for 547.

9 MR. LITTLE: While I have Nimish on
10 the mike here, I think one of the changes that
11 we did make was with requiring the hard sheets,
12 I guess. Maybe we can talk about that, and we
13 didn't really get any comments from that from
14 the manufacturer. Maybe you can talk about
15 that a little more.

16 MR. PUROHIT: Sure. So as Mike was
17 going through, Mike Hoenig was going through
18 the presentation, the one section he pointed
19 out was a requirement that has been eliminated
20 as a probability requirements to be designed
21 under, and that was morphed into a requirement
22 by manufacturers to not have any other
23 restrictions unless placed by a tribal
24 regulator of what the specific odds are going
25 to be, but it was replaced with the requirement

1 of manufacturers not only having all the game
2 maps tested by a independent test lab, but also
3 submitting that in what would be the equivalent
4 to a par sheet on the Class II side, but it's
5 not called a par sheet, it's called a game
6 sheet, what have you, to submit it to the
7 tribal regulator and the tribal operator as is
8 industry standards, so that was kind of one of
9 the shifts in that particular approach based on
10 what the comments that we received during the
11 discussion draft and also by the Tribal
12 Advisory Committee.

13 MR. LITTLE: Right. Thanks, Nimish.
14 That was one of the areas where we thought we
15 would get a lot of comment from the
16 manufacturers, and we haven't heard anything at
17 all. The only thing I could estimate that
18 would mean is a positive thing for the TGRA, so
19 they can see how the systems are expected to
20 work.

21 Was there any other comments?

22 Well, I guess we could probably just start
23 on 543. We've got a scheduled break in a half
24 an hour. I guess we can -- we could -- does
25 anyone need a break or can we just start off

1 and then we'll see how far we can get through
2 before the 10:30 break. Okay.

3 MS. WARD: Good morning again. My
4 name's Jennifer Ward and I am the staff
5 attorney that works with primarily this region,
6 the St. Paul region, so if you've got an
7 ordinance that you're working on it's probably
8 come across my desk, so now you can put a face
9 to the name.

10 We'll start this morning on Part 543,
11 minimum internal control standards for Class II
12 gaming. And this part addresses only Class II
13 games and their associated functions. The
14 proposed rule is based on the discussion draft,
15 which was a new document, and it took ideas
16 from several different sources, including our
17 current MICS, the TAC recommendation, the
18 Tribal Gaming Working Group guidance, and the
19 2010 proposed MICS.

20 There were a few things we did with this
21 proposed rule, generally. In response to
22 comments we reviewed the use of agent, person,
23 and personnel throughout the document and made
24 changes where it was appropriate to make sure
25 that the word there was what we meant it to

1 say, and we also inserted as needed language in
2 each of the supervision provisions, excepting
3 the IT section, and we did that to promote
4 consistency in the proposed rule. We also
5 added supervision provisions for patron deposit
6 accounts, lines of credit, and surveillance.

7 In the definitions section we made a few
8 changes to the drop definitions. The drop
9 proceeds definition has been amended to include
10 financial instrument storage component
11 proceeds. And the drop definition has been
12 deleted because it's unnecessary. The process
13 of collecting boxes and components is described
14 in the drop account section itself.

15 The definition of gaming promotion has
16 been altered to include only those promotions
17 requiring game play to participate, and when I
18 say altered it was altered from our current
19 MICS, but that's -- this definition is the same
20 as it appeared in the discussion draft.

21 The definition of sufficient clarity
22 continues the 20 frames per second minimum, but
23 it adds clearly identify to the requirements.
24 And again, this is the same as it was in the
25 discussion draft. Now, here the commission

1 invites comments on this. We received several
2 comments that said that it -- the 20 frames per
3 second could limit technology, and we're
4 interested in hearing why specifically and
5 we're also interested in hearing if we changed
6 the language to say 20 frames per second or
7 equivalent would that resolve any limitation on
8 technology that this could have. Those are two
9 questions we're hearing your comments and the
10 answers to.

11 While I hear some murmurings in the back
12 at this point I just want to take another
13 opportunity to remind you, if you want to
14 interrupt me at any point if you have questions
15 please feel free. We don't have to wait until
16 the end of this presentation certainly and it
17 could spur some more discussion.

18 On Section 543.3, how tribes comply with
19 this part. There are minimum standards, and
20 the TGRA may establish additional controls that
21 do not conflict with this part. The
22 regulations provide a framework that recognizes
23 the significant role of the TGRAs, and
24 throughout this document the TGRAs establish
25 thresholds for investigating variances and to

1 implement procedures for various standards.
2 And they have 12 months to comply by
3 establishing and implementing procedures after
4 this rule goes final eventually. And there is
5 a difference between the existing and the new
6 facility compliance date. Existing facilities,
7 I believe, have 12 months to comply and new
8 facilities have until the next fiscal year. Is
9 that correct? Yes.

10 MR. WEST: Well, new facilities have
11 to be compliant.

12 MS. WARD: Okay. I'm sorry. That's
13 what I -- yes, new facilities have to be
14 compliant when they open and existing
15 facilities have up to 12 months.

16 543.4, the question here, does it apply to
17 small and charitable. Originally back in,
18 maybe it wasn't originally, 2002, there was the
19 charitable exception for MICS, so charitable
20 operations could be excepted from the MICS if
21 they met certain criteria. And then later down
22 the road during the next tradition of the MICS
23 the small gaming operations section was added,
24 and now as we're taking a look through this
25 we're wondering if the small gaming exception

1 has swallowed up the charitable and whether
2 charitable is still necessary, so if you want
3 to take a look at it and see if it still
4 applies in your operations or if the small
5 gaming operation exception covers it, please
6 let us know.

7 543.5, and this is about how tribes apply
8 to use an alternate standard, and this is what
9 Mike alluded to earlier in Part 547 discussion.
10 As it appears in the MICS this used to be the
11 alternate standard, used to be called the
12 variance, and as you know if you're on the
13 compliance side and the audit side a variance
14 is when you get an answer or an amount that's
15 different from what the expected amount was.
16 And so when you talk about this variance all of
17 a sudden you're talking about a new standard
18 that has to be approved, and it's very
19 confusing, we thought, so we changed the term
20 to say the alternate minimum standard, and
21 that's, again, based on public comments, and we
22 added the word minimum in here from the
23 discussion draft to clarify that this is really
24 talking about putting in place a different
25 minimum standard rather than applying to any

1 standard that exceeds what the MICS already
2 are.

3 The TGRA may approve the alternative
4 minimum standard but they still must obtain
5 approval from the NIGC chair, and the NIGC
6 chair review and decision is within 60 days,
7 and just like in 547, the chair may extend an
8 additional 60 days when necessary.

9 543.8 is the bingo section, and in
10 response to public comments we have combined
11 the gaming machine gaming systems for bingo and
12 the manual bingo sections. The commission
13 agrees that bingo is bingo and has combined it
14 into one section now.

15 543.7 was the gaming system bingo section,
16 and it's now been reserved.

17 We believe this is less procedural than
18 the existing MICS, but it requires TGRA and/or
19 the operation to establish controls that meet
20 the detailed criteria, and for an example of
21 how it's less procedural you can see 543.8B1
22 that talks about bingo card inventory. And it
23 still requires a verification of prizes over
24 \$1,200, and the player interface may serve as
25 one verifying signature for a manual payout,

1 and it may serve as the sole verifying
2 signature for an automatic payout, leaving the
3 discussion draft. It was inadvertently left
4 out and it said that the -- it required two
5 signatures and it wasn't clear that the machine
6 could be one of them, so we wanted to clarify
7 that in this case for a manual payout the
8 machines can indeed serve as a verifying and
9 validate signature.

10 Section 543.9 covers pull tabs, and here
11 the pull tabs limit for the prize verification
12 is still \$600, and we've changed the definition
13 of kiosk so that it clarifies that it may also
14 be capable of redeeming and reconciling pull
15 tabs. That was in response to a comment that
16 we received saying that it limits technology if
17 the kiosks can't redeem and reconcile pull
18 tabs, then it -- it limits technology, so we
19 added a provision it would allow the kiosk to
20 do that so long as after the pull tabs are
21 pulled out from the -- are removed from the
22 machine that they are destroyed, secured and
23 destroyed in accordance with the TGRA
24 procedures, and that allows the kiosk to go
25 ahead and redeem and reconcile the pull tabs

1 without having to deface it as required by the
2 manual redemption and reconciliation.

3 543.10 is the MICS for card games. TGRAs
4 review and approve cancellation and removal
5 procedures, and this continues the standard
6 that no administrative or overhead fees may be
7 taken from player pool funds.

8 We did receive one comment that the
9 supervision section may not provide for
10 adequate supervision of the card room, and we
11 request additional comments on that.

12 543.12 covers gaming promotions and player
13 tracking. The gaming promotion standards are
14 limited to those promotions that require game
15 play to participate. And the player tracking
16 systems are included here as well because
17 they -- they're designed to track game play and
18 give awards based on the game play.

19 543.13 is MICS for complimentary services
20 and items, requires the TGRA or the -- and the
21 operation to establish specific controls and
22 procedures, and the TGRA establishes the
23 threshold for recording comps.

24 543.14 is MICS for patron deposit accounts
25 and cashless systems. As it was in the

1 discussion draft we've removed any reference to
2 unrestricted player accounts. It appears that
3 the Bank Secrecy Act would prohibit
4 unrestricted player funds where anyone can
5 access them, so we removed them from here.

6 543.15, the lines of credit, it covers the
7 establishment of lines of credit, and we
8 received some comments that this provision, the
9 section isn't necessary, and we invite comment
10 on why that would be the case or why not. We
11 have heard in the consultations that several
12 tribes either have lines of credit procedures
13 or are looking to add them in the future, so it
14 does not apply. If it's unnecessary we would
15 like to hear why.

16 543.17, the MICS for drop and count. This
17 has been simplified. It is still a bank
18 procedural section, just the nature of drop and
19 count, but this does provide for more TGRA and
20 operation discretion than the previous MICS.

21 543.18 covers cage, vault, cash, cash
22 equivalents, and kiosks. And again, we've
23 added kiosks to this section, and it requires
24 that any cage increase or decrease of \$100 or
25 more must be verified, documented, and

1 recorded, and promotional payments of \$100 or
2 more must be documented.

3 543.20, MICS for information technology
4 and IT data. Most of these topics were adopted
5 from the TAC, and you'll see the list there, a
6 few of them are the physical security, logical
7 security, data backups, remote access, for
8 example. We also added a definition of system
9 in the IT section to distinguish it from the
10 Class II gaming systems, and that definition of
11 system applies to the IT section only and it
12 was based on public comment that said there was
13 some confusion as to what exactly we were
14 talking about in the IT section when we
15 referenced system, and a question as to whether
16 or not we may be referencing the Class II
17 gaming systems or something else, so we have
18 provided a definition there.

19 543.21 is the MICS for surveillance. It
20 requires cameras with sufficient clarity in the
21 count room, card tables, and cage and vault.

22 For Class II gaming systems, the
23 surveillance must include the jackpot meter.
24 We removed the requirement of surveillance of
25 the bingo server based on public comment, and

1 after reviewing the IT section again we
2 determined that the physical and logical
3 controls for the bingo servers in the gaming
4 systems are adequate in those sections.

5 The commission invites comments on whether
6 the one-year retention period for surveillance
7 footage is appropriate.

8 And this section requires the TGRA
9 approved procedures for reporting suspected
10 crimes and suspicious activity.

11 543.23, MICS for audit and accounting, the
12 annual requirements in this section adopt the
13 TAC recommendation.

14 And 543.24, the MICS for revenue audit,
15 this is separated out from audit and
16 accounting. It specifies the frequency of each
17 testing procedure. And the game sections, for
18 example, the Class II gaming systems, bingo,
19 pull tabs, and card games, those all adopt the
20 TGWG guidance.

21 And these sections are largely unchanged
22 from the discussion draft. The changes that
23 you'll see relate to our combination of the
24 bingo sections because they reference back, so
25 we -- you'll see changes there. Otherwise

1 these sections are largely the same from the
2 discussion draft. And with that I open it up
3 for comments and questions. Any --

4 MR. CHAPMAN: Good afternoon, good
5 morning again. I think I have two areas of
6 this I wanted to briefly clarification.

7 MR. LITTLE: Sir, can you please
8 state your name and organization?

9 MR. CHAPMAN: Duane Chapman from Lac
10 du Flambeau. One area, I believe this is for
11 definition clarification, you move to change
12 alternate standard variance. Is there a
13 necessity to create a definition for
14 alternative standards, or had that been
15 addressed? If I go to 543.5.

16 MS. WARD: Okay. I'm at 543.5.

17 MR. CHAPMAN: Yeah, 543.5,
18 alternative standard versus variance, I'm just
19 curious, is there a need or a necessity to
20 create a definition for alternative standard?

21 MS. WARD: I don't think that we do
22 in the definitions, do we? We don't. I
23 believe we discussed this, and at the time we
24 discussed it internally, we didn't think that
25 there was a need for it, but if you do that's

1 something we'd like comment on. It seems to
2 spell out the procedure for it. In the NPRM we
3 attempted to explain a little further what
4 exactly an alternate system is, but again, if
5 that's something you really feel a definition
6 is necessary for it's something we'd like to
7 hear, and if you have a discussion for what
8 that definition should be we'd like to hear
9 that as well.

10 MR. CHAPMAN: Currently not at this
11 time, but to expound on it later I think that
12 there's obviously opportunity through the time
13 period to provide some feedback to you.

14 The other area was considering to
15 understand, because I'm not -- I'm just not
16 aware of it, on your 543.21 standards, you talk
17 about commission invites comments on whether
18 one-year retention period for surveillance
19 footage was appropriate. To understand that,
20 can someone please clarify that there currently
21 is a standard, that surveillance footage is to
22 be maintained for one year? Is that how I
23 understand it?

24 MS. WARD: It's not all surveillance,
25 it's only the surveillance that records

1 suspicious activities, suspected crimes, or
2 detentions by security personnel, I believe.

3 MS. MURRAY: That is not enforced
4 right now, if that's -- if that's your
5 question. That was in the discussion draft,
6 and it was based on the Tribal Gaming Working
7 Group guidance recommendation, so that is
8 not -- that is not a standard that is currently
9 in practice. And we are interested -- we did
10 receive some comments suggesting that that was
11 not a reasonable retention period for
12 surveillance footage, but since it was Tribal
13 Gaming Working Group recommendation we are
14 interested in hearing more input and comments
15 on if that is not -- if that is not an
16 appropriate period what -- what would be a more
17 appropriate period or if that -- if the tribes
18 agree that that is an appropriate period for
19 that type of surveillance footage, so we're
20 very interested in receiving comments on that.

21 MR. CHAPMAN: Okay.

22 MS. WARD: And if it helps, the cite
23 for that is 543.21E2. It's towards the end of
24 that section.

25 MR. CHAPMAN: Please restate that,

1 please.

2 MS. WARD: 543.21E2, and it's toward
3 the end of the section.

4 MR. CHAPMAN: Okay. I appreciate the
5 time. Thank you.

6 MS. WARD: You're welcome.

7 MR. LITTLE: Thank you, sir. Is
8 there any other -- any other comments?

9 MR. ORCUTT: I'm looking at the
10 discussion --

11 MR. LITTLE: Sir, just need you to
12 grab a mike and state your name and
13 organization for the record, please.

14 MR. ORCUTT: Rob Orcutt, attorney for
15 Oneida, the Oneida Casino. I was -- just a
16 clarification. I was looking at the discussion
17 draft and it looks like, if I'm reading it
18 right, the cite for that is D2.

19 MR. LITTLE: On the discussion draft
20 or the Notice for Proposed Rulemaking?

21 MR. ORCUTT: Preliminary draft on
22 April 27.

23 MR. LITTLE: Yeah.

24 MS. WARD: In the proposed rule
25 that's in the Federal Register.

1 MR. ORCUTT: Oh, I'm sorry, it's
2 this --

3 MS. WARD: Yeah. It could very --
4 you're probably right and I don't know what
5 would have changed --

6 MR. ORCUTT: Okay.

7 MS. WARD: -- in the cite, but in the
8 proposed rule it is E2.

9 MR. ORCUTT: Okay. Thanks.

10 MS. WARD: You're welcome.

11 MR. LITTLE: Sir, again -- -

12 MR. CHAPMAN: It's Duane Chapman,
13 again, from Lac du Flambeau. I just want to
14 clarify my inquiry on this inquiry as to I've
15 been doing audits for casinos for the last ten
16 years, and one of the things with looking at
17 federal regulations and NIGC MICS or any other
18 MICS out there is understanding what the intent
19 of it is, and also to apply, you know,
20 reasonable -- reasonableness and understanding,
21 you know, that the language is written in such
22 a way where it reduces ambiguity, and because
23 as we can all probably attest to out there in
24 the audit world there are several ways to look
25 at things, and not only from a regulatory --

1 there's regulators' side of it, but from a
2 operations side of it they look at it in a
3 varied way also, so my intent is just to try to
4 have some clarification to understand what
5 intents of those regulations are and, you know,
6 I know this is an ongoing process and for me
7 and I just need to do additional homework to
8 reach out and consult with you all to further
9 help me clarify what things are moving forward
10 with. Appreciate it again.

11 MS. MURRAY: I really appreciate,
12 appreciate that comment, Mr. Chapman,
13 especially because you point out that it's not
14 always the same perspective between the
15 regulatory authorities and the operations, and
16 that's kind of what we're trying to balance
17 with this, with this particular provision, is
18 that from an operational standpoint a one-year
19 retention period may not be reasonable because,
20 for instance, if you have backup tapes or
21 something like that you have a specific amount
22 of room that you -- that you -- that you can
23 have to -- for these tapes to either take up
24 space or you need to reuse your tapes, and it
25 can be a significant cost to upgrade or to do

1 something different, so we understand that
2 perspective. Also for regulatory perspective
3 our purpose is to protect the integrity of the
4 operation, so the purpose in having a retention
5 period at all is to assist the operation in
6 protecting -- protecting itself, its integrity,
7 and also for, you know, law enforcement
8 purposes, recovery, theft, etc., in those -- in
9 those circumstances, so that's why we're
10 interested in hearing comments both from the
11 operational perspective as well as from tribal
12 regulators to see what -- what compromise we
13 can reach or what works best from everyone's
14 point of view, so I do really appreciate that,
15 that comment. Thank you.

16 MR. CHAPMAN: Thank you. Again, just
17 expressing to clarify what you're saying,
18 identify a happy medium between operations and
19 regulations.

20 MS. MURRAY: That's exactly right.

21 MR. CHAPMAN: Thank you.

22 MS. MURRAY: Thank you.

23 MR. LITTLE: That's one of the
24 reasons why we did throw out the comment for
25 that, the request for more information, because

1 this is -- it is an area that we did discuss,
2 the commission discussed, and we just needed
3 more information, you know, is one year too
4 long, whatever, you know, the challenge is,
5 logistical challenge like Sarah had pointed
6 out, so we'd be very, very grateful if you
7 could provide us some more information on that,
8 so appreciate that.

9 Does anyone else want to make comments?
10 I'm thinking we should maybe go to a 15 or 20
11 minute break, come back, and give you a chance
12 to, you know, catch a drink or use the
13 restroom, check out of your hotel room if you
14 need to, I know I will be doing that, and then
15 see if anybody's got some thoughts they want to
16 share with us. We'll come back at 10:45, okay?

17 (Short break was taken.)

18 MR. LITTLE: I'll open the floor back
19 up to comments if anybody has had a chance to
20 consider some things and want to comment for
21 the record. Please feel free to now. You
22 know, one of the -- one of the big items in the
23 Part 543, the difference between the Notice of
24 Proposed Rulemaking and the discussion draft
25 that -- and you know, kind of the demonstration

1 that we're -- we listen to the comments and we
2 take everything that we receive very seriously,
3 and in the discussion draft, and this was born
4 out of some discussions during the Tribal
5 Advisory Committee, we split manual bingo with
6 electronic bingo and we heard overwhelmingly
7 from the comments from the tribes that that was
8 not a good idea, so you see in the Notice of
9 Proposed Rulemaking that bingo is bingo, it's
10 in one section, and the commission, we put out
11 there in the discussion draft, and as we had
12 said during the consultation of the discussion
13 draft that there were things in there that we
14 included, that were put in there to generate
15 some -- some thinking and some comments, and
16 that was one particular area that we were, you
17 know, had to come to us in a decision and
18 that's where we're going to go, and I'm once
19 again referring to the discussion draft, so
20 when it came time to develop the Notice of
21 Proposed Rule we did decide that bingo is bingo
22 regardless of how it's played, whether it be
23 with paper or through a technical aid, it's
24 still bingo and we did consolidate that back
25 into one section, so you saw that in the Notice

1 of Proposed Rule.

2 I'm not sure if anybody wanted to make a
3 comment on that. I know we did talk about the
4 retention period, very important, you know, we
5 did -- we did include that one year, that was
6 basically from the Tribal Advisory Committee
7 guidance document, but we definitely are very
8 open to more comment on that.

9 One of the areas that we -- we talked
10 about extensively during, you know, our
11 internal deliberations was on sufficient
12 clarity of the cameras, and that was an area
13 that was raised or in the Tribal Advisory
14 Committee, we really are interested in hearing
15 what you have to say about the types of
16 cameras, the, you know, minimum frame
17 requirements, how that can affect your
18 operation, if there are particular areas that
19 you need, you know, more sophisticated cameras,
20 you know, what are they, what are the
21 limitations that some of these, if we were to
22 create a stricter standard, what would that
23 impose for your operations, so you know, we're
24 really interested in hearing about that.

25 I'm just going through the -- the Notice

1 of Proposed Rule in some of the areas where we
2 did ask for questions, if you want to -- if you
3 want to, you know, step up and comment please
4 feel free to. Don't -- you don't have to wait.

5 You know, we talk about, and it was an
6 area that the Tribal Advisory Committee raised,
7 we're talking about player tracking, gaming
8 promotions, comps, lines of credit where some
9 felt that it was outside of the authority of
10 the NIGC. You know, we obviously disagree, and
11 we did kind of spell out our reasoning why.
12 You know, all these, you know, issues pertain
13 to play. You have to play to participate in
14 the, you know, receiving comps or, you know,
15 gaming promotions. We tried to pull out any
16 specific instances where there could be a
17 promotion that did not specifically require
18 some type of game such as if there was a
19 drawing for a particular prize where you had to
20 put your name on a card in a tumbler, that's
21 outside the authority of this commission, so we
22 want to try to clarify that, but we do know
23 that these are potential areas for risk and
24 that's important, that you know, we do
25 establish standards, but this is what we've

1 seen, you know, problem areas rise, and I'm
2 sure you all have seen these too, so one of the
3 reasons why we feel it's important to keep
4 these in there, you know, lines of credit is
5 another area where the Tribal Advisory
6 Committee felt we didn't have any authority.
7 We know this is an area that in the Class II
8 operations have very limited use, but we do
9 have obviously mixed floors where you have
10 Class II and Class III where it is being
11 utilized, so we do feel there's a need there.

12 Another section that Jen had pointed out
13 on the drop and count, and while it can be
14 rather cumbersome in the reg, you know, it's an
15 important -- it's such an important part of the
16 standard that it needs to be specific in some
17 areas, but if there's some things you think
18 could be, you know, better explained or
19 clarified in the standard we definitely are
20 open to your thoughts and ideas.

21 Does anybody have anything they want to
22 add?

23 MS. MURRAY: I had some actually
24 really great conversations over the break, and
25 I don't mean to put you on the spot, Eric, but

1 he pointed out, and for those of you who don't
2 know Eric, he is in charge of slots here at
3 Oneida and he -- he mentioned that although
4 they do mostly Class III there that he was
5 pointing out some areas that in our 547 ranks
6 that could potentially limit technology, and
7 that, as explicitly stated in 547, is not the
8 goal. We do not in way want to limit
9 technology, and so while you're going through
10 547 and 543 if you do see areas that could
11 potentially limit technology please comment on
12 those and let us know how and in what ways
13 those -- those areas could limit technology and
14 ways that we could potentially remedy that
15 problem, so I really look forward to hearing
16 those comments and to reading the written
17 comments that we receive on those issues, so
18 thank you very much.

19 MR. LITTLE: Any -- any other issues
20 you think we need to talk about more? I'm
21 looking at staff here or -- and, you know, we
22 can also talk about 547, like I said, you know,
23 the grandfathering provision, there was some
24 major issues raised in the comments, and I did
25 talk about it prior to the break about, and

1 we're very interested in hearing about the idea
2 of how modifications, if the commission was to
3 require that future modifications, you know,
4 specific, either be parts or parts of the
5 system be replaced, if they were to be -- if it
6 was to be required that they are fully
7 compliant how would that affect the operations,
8 if you're using these grandfather gaming
9 systems, so please, you know, think about that.
10 I know many of you probably don't even have any
11 grandfathered systems, so definitely understand
12 that too.

13 MR. HOENIG: Can we just say along
14 those lines I really strongly encourage
15 everybody to definitely check out the preamble
16 to the reg. I know sometimes I just jump to
17 the reg itself, but there's a lot of questions
18 that are posted in the preamble for 547 and
19 543, but there's also a lot of explanation and
20 a lot of the kind of rationale and reasoning
21 behind some of the changes that the commission
22 made, so it's a good read.

23 MR. LITTLE: Yeah, this is
24 definitely, you know, the staff spent a lot of
25 time. I know I remember having a meeting where

1 I just basically asked Jen to put something
2 together and she did, so you know, they spend a
3 lot of time and we spend a lot of hours
4 together just going through the comments and
5 trying to make sure that we, you know, fully
6 explain our reasoning and rationale for making
7 the decisions that we made, but also
8 identifying areas where we need more input, we
9 need more information, and like we said, you
10 know, all along, we're not going to make these
11 decisions without, you know, fully providing
12 opportunity for tribes to comment and, you
13 know, thoroughly feel that, you know, your, you
14 know, input was reviewed carefully.

15 So I don't necessarily want to keep
16 everybody if -- if there really isn't any
17 comments. You know, I do understand that the
18 reg was just published on the 1st, so maybe you
19 haven't even, both regs, rather, published on
20 the 1st, had a chance to fully review them, so
21 like I said, the comment period is open until
22 July 31, so there's a lot of opportunity to
23 send in comments. There will be four
24 additional consultation sessions that are
25 posted on our website that I encourage you to

1 attend if you can. Otherwise we're not going
2 to adjourn for the day, because I want to make
3 sure that if there was any folks that were
4 planning to be here at 1:30 after the break,
5 after the lunch break, get an opportunity to
6 speak. However, this does not mean that you
7 have to come back at 1:30. We're going to be
8 back at 1:30. If you know you've seen -- if
9 you provide all the information that, you know,
10 you came here to do then that's fine. I wish
11 you safe travels and thank you for your coming,
12 for coming today. And if you feel like you
13 might miss something, like I said, the --
14 everything will be, the transcript will be
15 posted on the website so you can review those
16 afterwards, so I think I'll, if there's no
17 other comments I'm just going to, we're going
18 to break for lunch and then we're going to come
19 back at 1:30. Thank you, everybody, for
20 coming, and if you do leave please safe travels
21 and please send those comments, so thank you
22 very much.

23 (Lunch break was taken.)

24 MR. LITTLE: We're going to continue
25 the Notice of Regulatory Review for NIGC

1 Regulations Part 547 and 543. I'm going to
2 open the floor back up to any comments that may
3 be out there. Sir, if you want to come to the
4 microphone, state your name and the
5 organization.

6 MR. HENSLEY: Harvey Hensley, Oneida
7 tribal internal law. I was requested to come
8 back and ask a couple questions about
9 availability of analysis for decision-making.

10 MR. LITTLE: Okay.

11 MR. HENSLEY: Some jurisdictions,
12 particularly ours here, we have possibility of
13 having Class II and Class III games. Has
14 there, analysis been done as far as the
15 stringent sheet, a comparison been done between
16 the new Class II and the Class III regulations
17 as far as stringency goes, more or less,
18 particularly cage, vault, drop count, sheet
19 software, so forth, and can we obtain that
20 analysis for our decision-making?

21 MR. LITTLE: I'm not aware of an
22 analysis that I've done.

23 MR. HENSLEY: There's no stringency
24 analysis? We're required by the State of
25 Wisconsin, our Class III regulations be as

1 stringent as the NIGC regulations, so there may
2 be a question from our standpoint when a Class
3 II regulation might be less or even more
4 stringent as to which way we go with that.

5 MR. LITTLE: All right. Well, I'm
6 assuming, I don't know the details of your
7 contract, that the contract specifically, does
8 it have a provision where you're required to
9 meet or exceed an NIGC Part 542?

10 MR. HENSLEY: No, sir. Well, as far
11 as Class III, yes.

12 MR. LITTLE: Okay.

13 MR. HENSLEY: But I'm not aware of
14 any pronouncements so far as far as these new
15 class regulations.

16 MR. LITTLE: I think just from the
17 nature that the Part 542 has not been updated
18 in a very long time. The way that technology
19 is moving so quickly, I'm sure Russ can jump in
20 and provide more information, but it would seem
21 that probably the new Part 543 would be more
22 stringent, I'm assuming. I don't know what,
23 Rest, you want to add to that, but that only,
24 you know, we work out of a, you know,
25 understanding of the Supreme Court or the, I'm

1 sorry, the court decision in Creek (phonetic.)
2 that basically outline our, the NIGC's role
3 with Class III gaming, so you know, that is an
4 issue that the commission, you know, has been
5 reviewing and looking at that is important that
6 that regulation is becoming outdated because of
7 the, you know, the change in technology, and
8 you know, but you know, under IGRA, you know,
9 there is clearly a role for the NIGC in
10 regulating Class II gaming and, you know, we
11 feel very confident that this, you know,
12 proposed regulation in Part 543 does create
13 some, you know, good standards that does create
14 some, you know, good protections in there for
15 the integrity of the operation, so we haven't
16 done an analysis on that. I'm not sure if we
17 were ever asked to do one or --

18 MR. HENSLEY: It's a comparison.

19 MR. LITTLE: Right.

20 MR. HENSLEY: So that's not
21 available.

22 MR. LITTLE: No.

23 MR. WEST: And some of the standards
24 have been moved from different sections and
25 stuff, so I don't know if you could get a

1 clear-cut comparison on cage to cage, because
2 some of the things might have been moved to
3 another section. I mean, you might, you know,
4 there may be some standards in the Cage 543
5 cage that are more stringent than 543, and then
6 on the other side there might be some that are
7 less, so I just don't --

8 MR. HENSLEY: And my second question
9 has to do with availability of analysis also.
10 You gave an example where surveillance over the
11 server was not deemed needed --

12 MR. LITTLE: Right.

13 MR. HENSLEY: -- per comments? Was
14 there an analysis that was done that we could
15 have as to why that would be?

16 MR. LITTLE: Well, if you look in the
17 preamble of the regulation we kind of explained
18 the reasoning, you know, it was surveillance of
19 the server because often times the server's not
20 located at the facility, it became problematic
21 and that --

22 MR. HENSLEY: I see.

23 MR. LITTLE: -- the commission felt
24 that there are, you know, there are checks and
25 balances and that does protect the integrity of

1 the server; however, you know, we're very open
2 and would definitely like to hear a comment if
3 you think that that is an area that we do need
4 to look at further and if there is a need
5 for -- for, you know, dedicated camera,
6 surveillance on the server. We would love to
7 hear from that and we would encourage you to
8 submit those, please.

9 MR. HENSLEY: Well, this is all kind
10 of preliminary. I expect us to have some more
11 comments. We haven't had a chance yet to
12 really review the new regulations.

13 MS. MURRAY: And I would just like to
14 reiterate that if your TGRA deems that a camera
15 over the server is necessary for your operation
16 there's nothing in the regulations that would
17 preclude your TGRA from inquiring that above
18 and beyond the MICS right now, but we are
19 interested in hearing comments about generally
20 the practicability and the necessity of doing
21 that across the board, so...

22 MR. HENSLEY: Well, we appreciate any
23 analysis that you folks could do. I know
24 earlier the gentleman mentioned about
25 explanations for the reasons for regulations.

1 That would be also -- also very helpful in a
2 casino environment to explain to the people
3 what these controls are all about, they're not
4 just regulations. There's a meaning and a
5 purpose for them. So kind of an advisory.
6 Several years ago a gentleman who was an
7 auditor in Vegas, published a book about what
8 are the reasons for these regulations, and that
9 was very, very well needed, and I still think
10 something like that, especially, I know you
11 can't audit Class III gaming, but you certainly
12 have an advisory position and you could explain
13 to folks why these regulations, why these
14 minimums are needed, and what they -- what they
15 do to serve and protect the assets of the
16 tribe. That's all.

17 MR. LITTLE: Now, you're right on,
18 and that's, you know, a very good point, you
19 know, I greatly appreciate that you stuck
20 around for a couple hours here to provide that
21 information, and Sarah, thanks for, you know,
22 raising that point, that these are minimum
23 standards and that the TGRAs can always add
24 additional requirements that, you know, they
25 feel is important to, you know, to their

1 operations, so good point to remind and, you
2 know, these are all good points, you know, I'm
3 sure you'll provide us with some other --

4 MR. HENSLEY: That was the example I
5 was asked to come back with.

6 MR. LITTLE: Okay. Thank you very
7 much, sir. I appreciate it.

8 MS. MURRAY: I did just want to say
9 that I appreciate the position that having
10 reasons for why regulations are necessary is
11 very important and it helps the TGRAs be able
12 to better administer the regulations as well as
13 having their own regulations, so -- so for the
14 proposed rule, looking at the preambles,
15 discusses, to some degree, the reasons for the
16 regulations, but I'm certainly happy to discuss
17 some guidance documents, some potential
18 guidance documents with -- with -- when we get
19 back to the office about why we have the
20 regulations.

21 MR. HENSLEY: Do you have -- do you
22 have some advisories like that?

23 MS. MURRAY: I don't know that we
24 have any currently, but I'm -- but I'm
25 certainly happy to bring this comment back in

1 and talk about creating something like that.

2 MR. HENSLEY: Those who work with
3 compliance have that difficulty a lot of times
4 with our audit teams. I'm an auditor.

5 MS. MURRAY: Right.

6 MR. HENSLEY: I'm not a gaming
7 regulator, and it helps to -- to get across to
8 folks why they need to do these things.

9 MS. MURRAY: No, I appreciate that.
10 Thank you.

11 MR. LITTLE: Great. Thank you. Is
12 there any other comments?

13 MS. MURRAY: Well, thank you so much
14 for coming and for sticking around for this
15 afternoon session. We appreciate it.

16 MR. LITTLE: All right. If there's
17 no other comments then I'm going to bring this
18 meeting to a close. I want to thank everybody
19 for attending. I want to especially thank our
20 staff, you do a great job. They're not
21 recognized enough. Without -- without them we
22 could never do our jobs, so on behalf of the
23 commission I just want to thank all the staff.
24 I wish you all safe travels and I want to thank
25 the United Nation again for, you know, for

1 providing these facilities for our use and
2 we're really happy to be here. We love coming
3 here. So safe travels everyone. Thank you.
4 Have a great day.

5 (Proceedings concluded at 1:39 p.m.)
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

1 STATE OF WISCONSIN)
) ss.

2 COUNTY OF MILWAUKEE)

3 I, ANNICK M. TRIMBLE, RPR, Notary Public
4 in and for the State of Wisconsin, do hereby
5 certify that the preceding deposition was
6 recorded by me and reduced to writing under my
7 personal direction.

8 I further certify that said deposition
9 was taken at ONEIDA CASINO, Green Bay,
10 Wisconsin, on the 7th day of June, 2012,
11 commencing at 9:05 a.m. and concluding at 1:39
12 p.m.

13 I further certify that I am not a
14 relative or employee or attorney or counsel of
15 any of the parties, nor a relative or employee
16 of such attorney or counsel, or financially
17 interested directly or indirectly in this
18 action.

19 In witness whereof, I have hereunto set
20 my hand at Milwaukee, Wisconsin, this
21 25th day of June, 2012.

22

23 -----
ANNICK M. TRIMBLE, RPR - Notary Public
24 in and for the State of Wisconsin

24

25 My commission expires October 6, 2013.

<p>1</p> <p>1 6:2 13:23 17:18 34:3 1,200 47:24 10 24:23 25:3,10 28:1 100 6:8 22:21 29:12 31:20,22 38:14,19 50:24 51:1 10:30 42:2 10:45 60:16 11 28:1 12 45:2,7,15 120 25:6,9,11,13 35:3,5 13,175 7:24 8:11 14 4:22 15 60:10 16 32:5 1:30 68:4,7,8,19 1st 67:18,20</p>	<p>4</p> <p>4 35:14</p> <p>5</p> <p>514 5:6 518 5:9 523 5:7 542 5:9 70:9,17 543 2:6 5:2 10:10,15 17:10,17 32:10,13 41:23 42:10 60:23 65:10 66:19 69:1 70:21 71:12 72:4,5 543.10 49:3 543.12 49:12 543.13 49:19 543.14 49:24 543.15 50:6 543.17 50:16 543.18 50:21 543.20 51:3 543.21 51:19 54:16 543.21e2 56:2 543.21e2. 55:23 543.23 52:11 543.24 52:14 543.3 44:18 543.4 45:16 543.5 46:7 53:17 543.5. 53:15,16 543.7 47:15 543.8 47:9 543.8b1 47:21 543.9 48:10 547 2:6 5:1,9 10:8 10:14 17:9,17 18:2 18:10 22:4,19 24:12 25:19 29:7 33:20,25 34:18 40:8 46:9 47:7 65:5,7,10,22 66:18 69:1 547.1 18:15 547.12 28:2 547.14 28:18</p>	<p>547.15 31:13 547.16 31:14 547.17 32:6 547.2 18:15 547.3 18:18 21:21 547.4 18:20 22:13 547.5 18:23 22:15 22:15 23:24 26:12 547.5. 21:24 547.6 26:23 547.7 26:24 547.8 27:12 547.9 28:1 556 5:9 558 5:9 559 5:9 571 5:9 573 5:9 580 5:10 585 5:10</p>	<p>accommodations 15:14 account 43:14 accounting 20:20,25 52:11,16 accounts 43:6 49:24 50:2 achieve 8:13 act 50:3 action 78:18 activities 55:1 activity 52:10 actual 23:11 27:5 34:23 35:10,13,16 add 50:13 64:22 70:23 74:23 added 19:17 20:3,6 20:25 43:5 45:23 46:22 48:19 50:23 51:8 adding 14:7 21:10 additional 31:10,19 44:20 47:8 49:11 58:7 67:24 74:24 address 21:3 addressed 53:15 addresses 42:12 addressing 29:6 adds 43:23 adequate 49:10 52:4 adjourn 68:2 administer 75:12 administrative 49:6 adopt 52:12,19 adopted 51:4 adverse 36:4 advertised 19:17 31:22 advisories 75:22 advisory 29:22 31:5 41:12 61:5 62:6,13 63:6 64:5 74:5,12 affect 22:12 25:15 62:17 66:7</p>
<p>2</p> <p>20 43:22 44:2,6 60:10 2002 45:18 2008 20:14 25:9 29:8 2008-4 29:8 2010 4:14 42:19 2011 4:20,20 2012 1:15 17:19,23 78:10,21 2013 24:23 25:3 78:25 2020 1:8 25th 78:21 27 56:22</p>	<p>6</p> <p>6 78:25 6,000 35:14 60 32:18,21,24 47:6 47:8 600 48:12</p> <p>7</p> <p>7 1:15 7th 78:10</p> <p>8</p> <p>8 25:9</p> <p>9</p> <p>9:05 1:23 78:11</p> <p>a</p> <p>a.m. 1:23 78:11 ability 23:18 able 13:10 14:15 26:16 33:3 37:7 75:11 access 17:21 50:5 51:7</p>	<p>6</p> <p>6 78:25 6,000 35:14 60 32:18,21,24 47:6 47:8 600 48:12</p> <p>7</p> <p>7 1:15 7th 78:10</p> <p>8</p> <p>8 25:9</p> <p>9</p> <p>9:05 1:23 78:11</p> <p>a</p> <p>a.m. 1:23 78:11 ability 23:18 able 13:10 14:15 26:16 33:3 37:7 75:11 access 17:21 50:5 51:7</p>	
<p>3</p> <p>3 2:6 10:6 29:8 30 32:16 31 17:23 34:7 67:22</p>	<p>3</p> <p>3 2:6 10:6 29:8 30 32:16 31 17:23 34:7 67:22</p>	<p>3</p> <p>3 2:6 10:6 29:8 30 32:16 31 17:23 34:7 67:22</p>	

<p>afternoon 53:4 76:15 agenda 10:7,12 15:23 16:1,3,21 agent 21:17 42:22 ago 3:23 15:5 18:3 74:6 agree 33:4 55:18 agrees 47:13 ahead 48:25 aid 61:23 airport 1:8 algorithm 28:23 30:1 allow 36:11 48:19 allowable 30:5 allowed 4:1 allowing 25:17 allows 48:24 alluded 46:9 altered 43:16,18,18 alternate 32:7,15,16 32:25 33:6,11 46:8 46:11,20 53:12 54:4 alternative 47:3 53:14,18,20 ambiguity 57:22 ambiguous 30:13 amended 19:24 25:19 43:9 amendment 25:21 amends 26:12 amount 46:14,15 58:21 analysis 69:9,14,20 69:22,24 71:16 72:9 72:14 73:23 analyze 29:17 ann 11:13 annick 1:21 78:3,23 annual 52:12 answer 20:23 46:14 answers 44:10 anybody 17:12 33:24 60:19 62:2</p>	<p>64:21 anybody's 60:15 anyway 38:20 apologizes 3:19 appeal 33:10 appeals 5:10 33:16 33:17,18 appeared 43:20 appears 46:10 50:2 applicable 22:7,10 26:17 27:13 application 18:21 22:14 applies 46:4 51:11 apply 18:22 22:8,9 25:20 29:13 32:7 45:16 46:7 50:14 57:19 applying 46:25 appreciate 15:13 38:22 56:4 58:10,11 58:12 59:14 60:8 73:22 74:19 75:7,9 76:9,15 appreciated 30:25 approach 21:2 29:21 30:6 41:9 appropriate 42:24 52:7 54:19 55:16,17 55:18 approval 32:17 47:5 approve 32:18 47:3 49:4 approved 23:14 33:1,4,7 46:18 52:9 approves 33:8 april 4:20 56:22 area 13:21 53:10 54:14 60:1 61:16 62:12 63:6 64:5,7 73:3 areas 37:10 41:14 53:5 62:9,18 63:1 63:23 64:1,17 65:5 65:10,13 67:8</p>	<p>arizona 34:11 artwork 31:15 asked 3:20 34:21 36:9 67:1 71:17 75:5 asking 20:17 39:25 assets 74:15 assist 59:5 assistance 4:7 assistant 12:18 associate 2:3 associated 42:13 association 7:1 12:8 13:2,5 associations 7:3,18 assuming 70:6,22 attempted 54:3 attend 68:1 attending 76:19 attest 57:23 attorney 12:12,21 42:5 56:14 78:14,16 audience 3:6,10 audit 14:6 19:18 46:13 52:11,14,15 57:24 74:11 76:4 auditor 11:5 74:7 76:4 audits 57:15 authorities 20:16 22:1 58:15 authority 23:6,8,9 23:15 30:4 63:9,21 64:6 authority's 21:7 authorization 28:5 automatic 27:23 48:2 availability 69:9 72:9 available 9:1 71:21 awards 49:18 aware 54:16 69:21 70:13</p>	<p>b back 16:4,25 19:23 20:10,18,21,22 21:5 21:9 24:7 44:11 45:17 52:24 60:11 60:16,18 61:24 68:7 68:8,19 69:2,8 75:5 75:19,25 backup 58:20 backups 51:7 balance 58:16 balances 72:25 ball 29:14 bank 50:3,17 barely 14:7 based 18:4 19:21,25 21:11 26:14 27:3 41:9 42:14 46:21 49:18 51:12,25 55:6 basically 4:9,10,15 8:3 10:5 62:6 67:1 71:2 basina 11:24,25 bay 1:9 78:9 becoming 71:6 behalf 2:8 3:15,23 13:11 14:16 76:22 believe 17:19 45:7 47:17 53:10,23 55:2 ben 2:14 12:24 best 2:11 7:8 59:13 better 38:1 64:18 75:12 beyond 73:18 bias 29:5,11,23,25 30:5,7,10,22 big 9:12 23:25 60:22 bill 12:9 bingo 27:18 29:14 39:23 47:9,11,12,13 47:13,15,22 51:25 52:3,18,24 61:5,6,9 61:9,21,21,24</p>
--	--	---	---

<p>bit 20:9 28:21,25 32:10 board 20:12 73:21 book 9:12 74:7 born 61:3 boxes 43:13 boy 15:2,7 break 16:3 41:23,25 42:2 60:11,17 64:24 65:25 68:4,5,18,23 briefly 53:6 brilliant 5:18 bring 5:19 75:25 76:17 broad 18:22 brothers 13:20 brought 24:23 25:25 35:7 36:24 buck 2:14 12:24,24 building 4:7 bulletin 29:8,10 business 3:16 busy 16:8</p>	<p>carryover 21:19 case 3:11 48:7 50:10 cash 50:21,21 cashless 49:25 casino 1:7 12:19,21 15:10,11 56:15 74:2 78:9 casino's 15:7 casinos 19:12 57:15 casual 20:7 catch 60:12 certain 37:10 45:21 certainly 16:20 44:16 74:11 75:16 75:25 certification 26:13 certify 78:5,8,13 chad 11:16 chair 32:17,18,23 33:9 47:5,6,7 chairman 2:9 3:3,5 3:7,12,22 11:22 14:6,9,25 chairs 33:1 chairwoman 2:8,24 7:22 challenge 60:4,5 chance 3:22 39:9 60:11,19 67:20 73:11 change 27:3 28:22 32:14 53:11 71:7 changed 27:7 28:24 44:5 46:19 48:12 57:5 changes 8:10 18:8 18:10 19:5 24:2,13 26:22 27:22,23,25 31:13 38:6 40:10 42:24 43:8 52:22,25 66:21 chapman 10:22,23 11:3,4 39:7,7 53:4,9 53:9,17 54:10 55:21 55:25 56:4 57:12,12</p>	<p>58:12 59:16,21 charge 65:2 charitable 45:17,19 45:19 46:1,2 check 2:13 32:21 60:13 66:15 checks 72:24 chi 31:8 chief 2:18 chose 21:15 chunk 12:3 circumstances 59:9 cite 55:22 56:18 57:7 city 34:11 clarification 53:6,11 56:16 58:4 clarified 64:19 clarifies 48:13 clarify 46:23 48:6 54:20 57:14 58:9 59:17 63:22 clarity 43:21 51:20 62:12 class 2:7 5:1,2 10:10 10:11 19:13 20:5,19 24:20,25 25:5 26:9 27:14 28:4,12,15 29:14 35:21,22 36:1 39:22 41:4 42:11,12 51:10,16,22 52:18 64:7,10,10 65:4 69:13,13,16,16,25 70:2,11,15 71:3,10 74:11 clear 8:23 33:5 48:5 72:1 clearly 43:23 71:9 close 37:19 76:18 closes 17:23 cochran 2:9 coin 5:21 collecting 43:13 combination 52:23</p>	<p>combined 47:10,13 come 4:1 5:24 15:1 15:17,20 16:4,17,17 16:25 39:4 42:8 60:11,16 61:17 68:7 68:18 69:3,7 75:5 comes 37:19 39:17 40:3 coming 3:15 6:10 13:8 20:21 68:11,12 68:20 76:14 77:2 commencing 78:11 comment 6:6 9:10 9:12,13 17:22 34:6 34:7 38:4 39:10,11 41:15 48:15 49:8 50:9 51:12,25 54:1 58:12 59:15,24 60:20 62:3,8 63:3 65:11 67:12,21 73:2 75:25 commented 39:13 commenters 36:14 comments 5:25 6:8 6:8,17,22 9:4,5,24 9:25 10:4 15:19 16:4,15,24 17:3,13 17:23,25 18:1,4,5 19:19,21 20:1 21:12 24:4,5 26:14,18 27:3 29:16 30:9,12 30:14,20 33:2,24 34:5,9,17 38:9,22 39:15 40:1,13 41:10 41:21 42:22 44:1,2 44:9 46:21 47:10 49:11 50:8 52:5 53:3 54:17 55:10,14 55:20 56:8 59:10 60:9,19 61:1,7,15 65:16,17,24 67:4,17 67:23 68:17,21 69:2 72:13 73:11,19 76:12,17</p>
c			
<p>cage 50:21,24 51:21 69:18 72:1,1,4,5 calculate 23:4 california 34:13 called 32:9 39:20 41:5,5 46:11 calling 32:14 camera 73:5,14 cameras 51:20 62:12,16,19 cancellation 49:4 cap 38:8 capable 28:13,14,16 48:14 card 27:18 47:22 49:3,10 51:21 52:19 63:20 carefully 67:14 carried 21:20 27:11 27:16 31:18</p>	<p>chairs 33:1 chairwoman 2:8,24 7:22 challenge 60:4,5 chance 3:22 39:9 60:11,19 67:20 73:11 change 27:3 28:22 32:14 53:11 71:7 changed 27:7 28:24 44:5 46:19 48:12 57:5 changes 8:10 18:8 18:10 19:5 24:2,13 26:22 27:22,23,25 31:13 38:6 40:10 42:24 43:8 52:22,25 66:21 chapman 10:22,23 11:3,4 39:7,7 53:4,9 53:9,17 54:10 55:21 55:25 56:4 57:12,12</p>	<p>58:12 59:16,21 charge 65:2 charitable 45:17,19 45:19 46:1,2 check 2:13 32:21 60:13 66:15 checks 72:24 chi 31:8 chief 2:18 chose 21:15 chunk 12:3 circumstances 59:9 cite 55:22 56:18 57:7 city 34:11 clarification 53:6,11 56:16 58:4 clarified 64:19 clarifies 48:13 clarify 46:23 48:6 54:20 57:14 58:9 59:17 63:22 clarity 43:21 51:20 62:12 class 2:7 5:1,2 10:10 10:11 19:13 20:5,19 24:20,25 25:5 26:9 27:14 28:4,12,15 29:14 35:21,22 36:1 39:22 41:4 42:11,12 51:10,16,22 52:18 64:7,10,10 65:4 69:13,13,16,16,25 70:2,11,15 71:3,10 74:11 clear 8:23 33:5 48:5 72:1 clearly 43:23 71:9 close 37:19 76:18 closes 17:23 cochran 2:9 coin 5:21 collecting 43:13 combination 52:23</p>	<p>combined 47:10,13 come 4:1 5:24 15:1 15:17,20 16:4,17,17 16:25 39:4 42:8 60:11,16 61:17 68:7 68:18 69:3,7 75:5 comes 37:19 39:17 40:3 coming 3:15 6:10 13:8 20:21 68:11,12 68:20 76:14 77:2 commencing 78:11 comment 6:6 9:10 9:12,13 17:22 34:6 34:7 38:4 39:10,11 41:15 48:15 49:8 50:9 51:12,25 54:1 58:12 59:15,24 60:20 62:3,8 63:3 65:11 67:12,21 73:2 75:25 commented 39:13 commenters 36:14 comments 5:25 6:8 6:8,17,22 9:4,5,24 9:25 10:4 15:19 16:4,15,24 17:3,13 17:23,25 18:1,4,5 19:19,21 20:1 21:12 24:4,5 26:14,18 27:3 29:16 30:9,12 30:14,20 33:2,24 34:5,9,17 38:9,22 39:15 40:1,13 41:10 41:21 42:22 44:1,2 44:9 46:21 47:10 49:11 50:8 52:5 53:3 54:17 55:10,14 55:20 56:8 59:10 60:9,19 61:1,7,15 65:16,17,24 67:4,17 67:23 68:17,21 69:2 72:13 73:11,19 76:12,17</p>

<p>commission 1:3 2:4 3:24 4:3 5:12,15 6:10 8:8,10,22 9:17 10:23 11:20,22 12:4 12:10,12,14 13:15 14:14 15:5 21:15 24:7,15 25:14 34:2 35:20 36:18 37:13 39:12 43:25 47:12 52:5 54:17 60:2 61:10 63:21 66:2,21 71:4 72:23 76:23 78:25 commissioner 2:3 11:2 17:8 30:14 39:18 commissioners 15:17 commitment 7:23 committed 8:10,23 committee 3:16 14:6 14:9 29:22 31:6 41:12 61:5 62:6,14 63:6 64:6 common 20:17 21:4 communication 7:9 community 14:19 14:23 company 39:20 comparison 69:15 71:18 72:1 completely 25:4 compliance 2:20,23 11:12,14,17,20,25 12:24 13:13,23 14:3 14:17,21 18:24,25 19:2 24:23 26:1,15 45:6 46:13 76:3 compliant 26:5 37:12,15 45:11,14 66:7 complimentary 49:19 comply 23:25 44:18 45:2,7</p>	<p>component 20:6 22:10 43:10 components 43:13 compromise 59:12 comps 49:23 63:8,14 computer 21:18 concern 38:15 concerned 38:10 concerns 21:3 concluded 77:5 concluding 78:11 conditions 36:22 37:17 confident 71:11 conflict 24:14 44:21 confusing 32:11 33:18 46:19 confusion 27:4 32:11 51:13 consider 60:20 considerate 10:4 consideration 36:24 considering 54:14 consistency 43:4 consolidate 61:24 consolidating 33:18 consult 8:18 58:8 consultation 4:6,19 7:9,16,24 8:5,6 36:13 61:12 67:24 consultations 15:25 34:10 50:11 context 30:2,10 continually 31:25 continue 16:2 17:4 68:24 continues 43:22 49:5 contract 70:7,7 control 10:11 17:10 28:10,11 42:11 controls 44:20 47:19 49:21 52:3 74:3 conversations 29:19 64:24</p>	<p>coordination 7:25 core 6:17 cornelius 12:11,11 correct 17:20 45:9 correlation 31:9 cost 58:25 council 14:5 councilman 14:10 counsel 2:17,22 17:8 78:14,16 counselor 2:24 count 50:16,19 51:21 64:13 69:18 country 3:25 county 11:19,25 78:2 couple 3:20,23 7:15 15:15 69:8 74:20 course 36:19 court 70:25 71:1 cover 17:2 covers 46:5 48:10 49:12 50:6,21 craps 15:8 create 53:13,20 62:22 71:12,13 created 14:4 32:1 creating 37:17 76:1 credit 43:6 50:6,7 50:12 63:8 64:4 creek 71:1 crimes 52:10 55:1 criteria 45:21 47:20 croix 12:10 crowd 15:10 cumbersome 64:14 curious 53:19 current 22:19 24:12 24:21,24 36:10 42:17 43:18 currently 38:16 54:10,20 55:8 75:24 customers 14:18 cut 72:1</p>	<p>d d2 56:18 dad 13:16,16 14:8 dads 13:24 dan 2:2 daniel 10:22 39:7 danielle 13:3 data 51:4,7 date 24:21,24 27:2 45:6 david 11:6 day 7:5 13:23 25:6 25:13 32:24 35:3 68:2 77:4 78:10,21 days 15:7 25:9,11 32:17,18,21 35:5 47:6,8 deadline 25:19 decade 6:11 decide 16:5 24:9 61:21 decided 24:7 31:6 decision 24:17 30:4 47:6 61:17 69:9,20 71:1 decisions 10:2 67:7 67:11 decorah 12:2,3 decrease 50:24 dedicated 73:5 deemed 72:11 deems 73:14 deface 49:1 defer 8:15 definitely 62:7 64:19 66:11,15,24 73:2 definition 19:5,20 19:24 20:2,5 21:13 21:17 43:9,11,15,19 43:21 48:12 51:8,10 51:18 53:11,13,20 54:5,8</p>
---	---	--	--

<p>definitions 18:16,17 19:4,18 20:7 21:17 43:7,8 53:22 degree 75:15 deleted 43:12 delgado 3:3 deliberations 8:9 62:11 demand 36:21 demonstration 60:25 deposit 43:5 49:24 deposition 78:5,8 described 43:13 desert 12:6 design 23:16,19 designable 29:24 designed 23:23 40:20 49:17 designees 7:19 desk 9:13 42:8 destroyed 48:22,23 detailed 6:21 47:20 details 70:6 detect 19:13 detentions 55:2 determined 4:23 52:2 determining 8:17 develop 8:13 61:20 devices 35:6,17 37:2 39:23,24 dialog 6:1 difference 45:5 60:23 different 20:19 32:13 42:16 46:15 46:24 59:1 71:24 difficult 26:19 difficulty 76:3 direction 78:7 directly 78:17 director 10:24 11:7 disagree 63:10</p>	<p>discharge 19:21 disclaimer 31:19 disclosed 27:24 discretion 50:20 discuss 60:1 75:16 discussed 25:23 53:23,24 60:2 discusses 75:15 discussion 3:9 6:5 6:18 9:7,14 18:3,8 20:2,3 21:19,20 22:5,16 24:2 26:13 27:10,16 31:4,10,17 31:25 33:5 34:19,19 36:13 38:5,10 39:14 39:25 41:11 42:14 43:20,25 44:17 46:9 46:23 48:3 50:1 52:22 53:2 54:7 55:5 56:10,16,19 60:24 61:3,11,12,19 discussions 31:5 61:4 display 27:3,5,6,20 31:24 displayed 38:13 displayment 27:4 displays 27:15,17 38:7 distances 16:9 distinguish 51:9 division 2:19,22 document 42:15,23 44:24 62:7 documented 50:25 51:2 documents 75:17,18 doing 15:11 36:3 57:15 60:14 73:20 download 28:13 downloaded 28:14 downloading 28:4 downloads 28:6 draft 6:5,19 9:7,14 18:3,9,10 20:3,3</p>	<p>21:20 22:5,17 24:2 26:14 27:10,11,16 31:4,17,25 33:5,5 36:13 39:25 41:11 42:14 43:20,25 46:23 48:3 50:1 52:22 53:2 55:5 56:17,19,21 60:24 61:3,11,13,19 drafted 20:14 22:17 drafts 38:10 39:14 drawing 63:19 draws 29:15 drink 60:12 drive 1:8 drop 38:5 43:8,8,11 43:14 50:16,18 64:13 69:18 dropped 19:22 du 10:23 11:4 39:7 53:10 57:13 duane 11:4 53:9 57:12 durbin 2:15 12:22 12:23</p>	<p>electrostatic 19:20 eliminated 40:19 eliminating 37:18 emerson 11:6,6 employee 78:14,15 enactment 35:5 encourage 66:14 67:25 73:7 encouraging 8:12 ended 6:6 energy 6:20 enforced 55:3 enforcement 59:7 enjoy 15:3 enjoyed 6:18 enroll 19:18 ensure 23:21 entertaining 27:15 27:17,20 38:7 environment 74:2 eprom 19:6,7 equal 36:12 equipment 10:9 23:13,16 equivalent 41:3 44:7 equivalents 50:22 eric 12:15 13:24 64:25 65:2 eric's 13:16 ernie 13:7 especially 58:13 74:10 76:19 establish 8:16,17 44:20,24 47:19 49:21 63:25 established 4:5 36:16 establishes 49:22 establishing 45:3 establishment 50:7 estimate 41:17 event 16:5 eventually 45:4 everybody 3:1,14,15 7:7 10:18 13:7</p>
		e	
		<p>e2 57:8 earlier 8:2 10:6 15:2 31:15 34:6 46:9 73:24 early 16:6,23 economic 36:22 37:16,22 ed 3:3 effect 22:20 34:25 effort 5:23 6:20 7:2 efforts 7:1 27:8 either 3:10 5:17 16:11 50:12 58:23 66:4 electromagnetic 19:25 electronic 19:10 28:19 61:6</p>	

<p>16:23 17:6 66:15 67:16 68:19 76:18 everyone's 59:13 exactly 24:9,12 51:13 54:4 59:20 example 47:20 51:8 52:18 72:10 75:4 exceed 36:12 38:14 38:18 70:9 exceeds 31:22 47:1 excepted 45:20 excepting 43:2 exception 45:19,25 46:5 excited 14:11 excuse 34:20 executive 7:23 8:11 existing 22:4 45:5,6 45:14 47:18 expanding 40:4 expect 73:10 expectations 23:5 23:11,12 expected 41:19 46:15 experience 29:17 expire 26:4 expires 78:25 explain 54:3 67:6 74:2,12 explained 64:18 72:17 explanation 66:19 explanations 73:25 explicitly 65:7 expound 54:11 expressing 59:17 extend 32:24 47:7 extended 24:24 extending 25:2 extends 39:22 extensive 9:25 extensively 7:23 62:10</p>	<p style="text-align: center;">f</p> <p>face 42:8 facilities 35:23 45:6 45:8,10,13,15 77:1 facility 15:12 45:6 72:20 fact 13:17 24:4 fair 27:22 fairly 20:15 fairness 22:16 fall 4:14 far 38:7 42:1 69:14 69:17 70:10,14,14 fashion 25:20 fast 13:18 father 14:4 federal 7:17 8:17 17:18,19,22,25 26:17 56:25 57:17 fee 33:12 feedback 54:13 feel 17:13 44:15 54:5 60:21 63:4 64:3,11 67:13 68:12 71:11 74:25 feels 37:13 fees 5:6 49:6 felt 8:5 36:18 63:9 64:6 72:23 field 32:20 final 5:6,7,17 9:23 45:4 finally 33:10 finance 12:19 financial 43:10 financially 78:16 find 17:21 fine 68:10 finger 35:16 first 13:15 18:12,14 20:13 fiscal 45:8 five 18:14 25:3 36:17 37:18</p>	<p>flambeau 10:23 11:5 39:8 53:10 57:13 flip 5:20 floor 16:14 23:15,22 24:22 60:18 69:2 floors 64:9 fluid 13:22 focal 34:17 focused 4:11 folks 13:8 15:18 16:5 20:4 39:1 68:3 73:23 74:13 76:8 follow 35:2 following 6:14,14 footage 52:7 54:19 54:21 55:12,19 forest 11:19,25 forever 13:14 forget 29:9 forth 26:15 69:19 fortunate 39:20 forward 13:18 58:9 65:15 four 4:5 15:4 34:10 67:23 frame 4:19 62:16 frames 43:22 44:2,6 framework 44:22 free 17:13 44:15 60:21 63:4 frequency 52:16 front 18:18 19:6 fully 35:20 37:12,15 66:6 67:5,11,20 functionality 21:1,1 functions 42:13 funds 49:7 50:4 further 54:3 58:8 73:4 78:8,13 future 50:13 66:3</p> <p style="text-align: center;">g</p> <p>game 23:21 25:7 26:3 27:18,18,19</p>	<p>31:15,18 32:3 41:1 41:5 43:17 49:14,17 49:18 52:17 63:18 games 10:10 36:3 37:12,24 42:13 49:3 52:19 69:13 gaming 1:3 2:4 5:2,3 7:1,3 10:9,11,23 11:1,11,13,17,19,22 12:3,6,8,10,12,14,15 13:2,4,15 14:2,13 15:17 19:11 21:7,25 23:6,8,9,13,14 24:20,25 25:5,22 26:9,11 27:14 28:4 28:12,15 29:14 35:24 37:2,5 42:12 42:18 43:15 45:23 45:25 46:5 47:11,11 47:15 49:12,13 51:10,17,22 52:3,18 55:6,13 63:7,15 66:8 71:3,10 74:11 76:6 general 2:17,21 12:18 17:8 18:9,21 18:24,25 22:14 29:21 33:12 generally 18:13 42:21 73:19 generate 61:14 generator 29:25 30:8 generators 28:20 29:3,13 gentleman 73:24 74:6 george 11:21,22 giles 13:1,1 give 49:18 60:11 gives 10:1 23:18 glad 3:25 glass 31:15 go 5:15 9:1 10:12,18 13:14 17:11,14</p>
---	---	---	---

<p>23:15 26:24 28:2 32:20 34:25 48:24 53:15 60:10 61:18 70:4 goal 7:6 21:10 65:8 goes 45:4 69:17 going 4:25 7:13 10:6 10:13,14,15 15:24 17:9 18:7,15,22,24 19:1,15 20:8 25:7 26:23 28:1,20,24 33:11 36:4,5 37:21 38:21 40:17,17,24 61:18 62:25 65:9 67:4,10 68:1,7,17 68:17,18,24 69:1 76:17 good 2:25 6:8,16 7:8 7:9 8:5 11:3,10,15 11:18,21,24 12:17 13:6 17:6 35:12 42:3 53:4,4 61:8 66:22 71:13,14 74:18 75:1,2 gotten 35:8 government 7:17,17 19:12 23:24 governments 7:25 grab 10:17 56:12 grandfather 34:24 36:17 66:8 grandfathered 25:8 25:12 26:9 36:3 37:11,24 66:11 grandfathering 19:2 24:1,3,10,15 26:3 34:15 65:23 grateful 5:22 60:6 great 13:17 14:17 15:10,12 64:24 76:11,20 77:4 greatly 6:23 30:24 74:19 green 1:9 78:9</p>	<p>group 2:6,7 6:17 10:6 42:18 55:7,13 guess 36:18 40:12 41:22,24 guests 14:12 guidance 42:18 52:20 55:7 62:7 75:17,18 guy 19:16</p> <hr/> <p style="text-align: center;">h</p> <hr/> <p>h 33:13 half 41:23 hallway 2:16 hammer 14:1 hand 78:20 handheld 39:23 hands 17:14 happened 13:17 18:8 happy 3:25 7:7 59:18 75:16,25 77:2 hard 5:13 7:4 37:16 40:11 hardship 38:21 hardware 26:25 hardworking 13:22 harvey 11:8 69:6 hawika 11:13,13 hazen 10:25,25 hc 4:7 hear 35:19 44:11 50:15 54:7,8 73:2,7 heard 8:21 32:19 34:18 35:14 36:10 37:9 41:16 50:11 61:6 hearing 37:10,21 44:4,5,9 55:14 59:10 62:14,24 65:15 66:1 73:19 heart 14:22 heels 6:4 held 3:9</p>	<p>hellos 2:11 help 58:9 helpful 6:22 10:21 35:18 74:1 helping 2:13 helps 5:19 55:22 75:11 76:7 hensley 69:6,6,11,23 70:10,13 71:18,20 72:8,13,22 73:9,22 75:4,21 76:2,6 henzley 11:8,8 hereunto 78:19 hey 20:17 hieroglyphics 29:2 high 18:10 35:14 historic 13:10 history 20:12 hitting 31:22 ho 12:3 hoenig 2:17 10:13 15:23 17:6,7 19:14 21:16 22:24 30:16 40:17 66:13 homework 58:7 horses 13:3,4 hot 15:7 hotel 15:3,13 60:13 hour 41:24 hours 67:3 74:20 house 20:18,21,22 21:5,9</p> <hr/> <p style="text-align: center;">i</p> <hr/> <p>idea 10:1 61:8 66:1 ideas 42:15 64:20 identify 43:23 59:18 identifying 67:8 igra 71:8 ii 5:1,2 10:10,11 20:5,19 24:20,25 25:5 26:9 27:14 28:4,12,15 29:14 35:21 36:1 39:22 41:4 42:11,12 51:10</p>	<p>51:16,22 52:18 64:7 64:10 69:13,16 70:3 71:10 iii 35:22 64:10 65:4 69:13,16,25 70:11 71:3 74:11 impact 26:6 34:23 35:1,17 36:5 37:22 impacts 25:2,17,21 26:10 implement 18:19 22:1 32:7 33:3 45:1 implementation 18:18 21:23 implemented 32:25 33:6 implementing 21:22 45:3 importance 4:23 35:21 important 8:1,14 9:20 13:9 35:19,23 35:25 62:4 63:24 64:3,15,15 71:5 74:25 75:11 importantly 9:10 14:13,19 impose 62:23 impossible 30:21,23 inadvertently 48:3 include 9:23 10:7 21:18 43:9,16 51:23 62:5 included 4:22 33:12 49:16 61:14 includes 2:6 including 42:16 increase 50:24 independent 29:18 29:20 40:5 41:2 indian 1:3 2:4 7:1 7:25 8:12,15 13:4 indians 3:17,17 indirectly 78:17</p>
--	--	---	--

<p>industry 19:11 35:21 36:1 41:8 information 4:16 5:23,25 8:8 24:8,16 28:13 30:24 36:8 39:4 51:3 59:25 60:3,7 67:9 68:9 70:20 74:21 informed 24:16 initial 29:7 initially 25:7 input 5:22 55:14 67:8,14 inquiring 73:17 inquiry 4:15 57:14 57:14 inserted 43:1 instance 58:20 instances 63:16 instructions 17:24 instrument 43:10 integrity 14:21 37:5 59:3,6 71:15 72:25 intent 57:18 58:3 intents 58:5 interested 37:9,20 44:4,5 55:9,14,20 59:10 62:14,24 66:1 73:19 78:17 interface 27:1 31:23 47:24 interference 19:25 internal 10:11 11:5 11:9 17:10 28:10 42:11 62:11 69:7 internally 53:24 interpretation 21:13 interrupt 17:13,15 44:14 introduce 10:19 inventory 47:22 investigating 44:25 invite 15:16,20 50:9 invites 44:1 52:5 54:17</p>	<p>issue 71:4 issued 18:2 29:10 issues 8:7 63:12 65:17,19,24 it'll 9:1 items 49:20 60:22</p> <p style="text-align: center;">j</p> <p>jack 12:18 jackpot 51:23 james 11:18 jason 13:1 jen 10:14 64:12 67:1 jennifer 2:20 42:4 job 76:20 jobs 76:22 john 12:7 joined 2:12 20:13 jordan 14:20 joseph 12:2 july 17:23 34:7,13 67:22 jump 66:16 70:19 june 1:15 6:2 17:18 34:3 78:10,21 junior 11:22 jurisdiction 22:12 30:6 jurisdictions 69:11</p> <p style="text-align: center;">k</p> <p>kansas 36:14 keep 13:18,19 64:3 67:15 kind 4:5 5:4 6:12 7:2,14 8:4 15:6 18:21 21:9,19 23:17 30:6 41:8 58:16 60:25 63:11 66:20 72:17 73:9 74:5 kiosk 48:13,19,24 kiosks 48:17 50:22 50:23 knew 6:15 24:8 know 4:3 5:15,19 6:9,9,14,15,16 7:5</p>	<p>7:15,18,21,22 8:3 8:14,21 9:19 13:15 13:25 14:6,7 15:18 16:7,24 20:20 22:6 30:15 34:3,4,5,23 35:2,20 36:6,6,21 36:22 37:7,12,16,25 37:25 38:4,6 39:3 46:6,12 57:4,19,21 58:5,6 59:7 60:3,4 60:12,14,22,25 61:17 62:3,4,10,16 62:19,20,23 63:3,5 63:10,12,12,14,14 63:22,24 64:1,4,7 64:14,18 65:2,12,21 65:22 66:3,9,10,16 66:24,25 67:2,5,10 67:11,13,13,14,17 68:8,9 70:6,22,24 70:24 71:3,4,7,8,8,8 71:10,11,13,14,25 72:3,18,24 73:1,5 73:23 74:10,18,19 74:21,24,25 75:2,2 75:23 76:25</p> <p style="text-align: center;">l</p> <p>lab 23:3 26:12 29:18 35:4,8 41:2 labeled 27:1,7 laboratory 27:9 labs 25:6 26:14 29:20 40:5 lac 10:23 11:1,4 12:5 39:7 53:9 57:13 language 22:4 30:13 43:1 44:6 57:21 largely 52:21 53:1 lastly 32:6 law 59:7 69:7 laws 26:17 leader 16:7</p>	<p>leaders 15:16 leading 7:2 leave 16:20 68:20 leaving 48:2 left 48:3 letter 9:16 lifted 25:13 light 15:9 limit 22:7 44:3 48:11 65:6,8,11,13 limitation 22:5 44:7 limitations 62:21 limited 25:17 49:14 64:8 limits 48:16,18 linda 2:15 12:22 line 9:1 lines 43:6 50:6,7,12 63:8 64:4 66:14 link 17:19 list 51:5 listed 31:12 listen 8:6 61:1 lists 9:13 literally 17:14 little 2:2,2 3:1,8,21 5:4 14:25 16:1 17:8 20:9,12,12,13 22:25 28:21,24 32:10 33:17,22 39:13,18 40:9,15 41:13 53:7 54:3 56:7,11,19,23 57:11 59:23 60:18 65:19 66:23 68:24 69:10,21 70:5,12,16 71:19,22 72:12,16 72:23 74:17 75:6 76:11,16 little's 30:14 located 72:20 logic 10:2 logical 51:6 52:2 logistical 60:5 long 16:9 48:20 60:4 70:18</p>
--	---	---	---

<p>look 14:1 15:9 30:1 30:10 39:9,19 45:24 46:3 57:24 58:2 65:15 72:16 73:4 looked 4:17,24 looking 17:15 50:13 56:9,16 57:16 65:21 71:5 75:14 looks 56:17 lot 6:15 7:3,4 24:3 34:17,18 38:5 41:15 66:17,19,20,24 67:3 67:3,22 76:3 loud 3:11 love 73:6 77:2 luck 2:11 lunch 16:3,4,6,25 17:1 68:5,18,23</p>	<p>march 6:6 marina 11:11 market 36:18,21 marketing 21:1 martirosyan 11:10 11:11 mashantucket 6:11 mathematical 23:4 23:10 mathematicians 29:19 mccain 14:20 mclester 12:15,15 mean 33:25 34:20 41:18 64:25 68:6 72:3 meaning 74:4 means 8:6 meant 22:6 42:25 media 19:10 medium 59:18 meet 25:18 47:19 70:9 meeting 1:5 3:3 66:25 76:18 meetings 7:16,19 member 3:6,10 members 5:14 memory 36:16 mentioned 15:2 65:3 73:24 met 45:21 meter 51:23 michael 2:16 10:13 15:23 17:3,7 microphone 39:5 69:4 mics 5:2 42:17,19 43:19 45:19,20,22 46:10 47:1,18 49:3 49:19,24 50:16,20 51:3,19 52:11,14 57:17,18 73:18 mid 6:6</p>	<p>mike 10:18 13:19 16:18 20:11 29:1 33:22 34:15 40:10 40:16,17 46:9 56:12 million 22:21 29:12 31:20,23 38:14,19 milo 11:24 milwaukee 78:2,20 mind 40:3 minds 13:11 37:1 mine 39:18 minimum 2:7 10:8 10:10 17:10 21:25 22:2,19,20 26:25 27:12 28:3,9,18 31:14 42:11 43:22 44:19 46:20,22,25 47:4 62:16 74:22 minimums 74:14 minute 60:11 minutes 23:3 missed 15:6 mixed 64:9 mode 19:18 modifications 25:20 25:25 26:4,5,8 36:10,11 66:2,3 modified 25:7 month 34:12 months 45:2,7,15 morning 2:25 3:13 11:3,10,15,18,21,24 12:2,17,20 13:6,18 13:19 17:6 42:3,10 53:5 morphed 40:21 move 16:21 31:14 53:11 moved 21:23 22:15 28:9 33:20 71:24 72:2 moving 21:21 58:9 70:19 murmurings 44:11</p>	<p>murray 2:23,25 55:3 58:11 59:20,22 64:23 73:13 75:8,23 76:5,9,13 myers 2:18</p>
m		n	
<p>m 1:21 78:3,23 machine 14:7 22:9 23:21 26:2 27:6 47:11 48:5,22 machines 19:3 48:8 maintained 54:22 major 4:5 34:16 65:24 making 8:9,9 10:2 67:6 69:9,20 management 12:16 manager 12:18 mandatory 31:2,7,8 31:11 manual 47:12,25 48:7 49:2 61:5 manufacture 23:10 27:2 manufacturer 40:14 manufacturers 39:10,10 40:6,22 41:1,16 mapping 30:11 maps 41:2</p>	<p>march 6:6 marina 11:11 market 36:18,21 marketing 21:1 martirosyan 11:10 11:11 mashantucket 6:11 mathematical 23:4 23:10 mathematicians 29:19 mccain 14:20 mclester 12:15,15 mean 33:25 34:20 41:18 64:25 68:6 72:3 meaning 74:4 means 8:6 meant 22:6 42:25 media 19:10 medium 59:18 meet 25:18 47:19 70:9 meeting 1:5 3:3 66:25 76:18 meetings 7:16,19 member 3:6,10 members 5:14 memory 36:16 mentioned 15:2 65:3 73:24 met 45:21 meter 51:23 michael 2:16 10:13 15:23 17:3,7 microphone 39:5 69:4 mics 5:2 42:17,19 43:19 45:19,20,22 46:10 47:1,18 49:3 49:19,24 50:16,20 51:3,19 52:11,14 57:17,18 73:18 mid 6:6</p>	<p>mike 10:18 13:19 16:18 20:11 29:1 33:22 34:15 40:10 40:16,17 46:9 56:12 million 22:21 29:12 31:20,23 38:14,19 milo 11:24 milwaukee 78:2,20 mind 40:3 minds 13:11 37:1 mine 39:18 minimum 2:7 10:8 10:10 17:10 21:25 22:2,19,20 26:25 27:12 28:3,9,18 31:14 42:11 43:22 44:19 46:20,22,25 47:4 62:16 74:22 minimums 74:14 minute 60:11 minutes 23:3 missed 15:6 mixed 64:9 mode 19:18 modifications 25:20 25:25 26:4,5,8 36:10,11 66:2,3 modified 25:7 month 34:12 months 45:2,7,15 morning 2:25 3:13 11:3,10,15,18,21,24 12:2,17,20 13:6,18 13:19 17:6 42:3,10 53:5 morphed 40:21 move 16:21 31:14 53:11 moved 21:23 22:15 28:9 33:20 71:24 72:2 moving 21:21 58:9 70:19 murmurings 44:11</p>	<p>murray 2:23,25 55:3 58:11 59:20,22 64:23 73:13 75:8,23 76:5,9,13 myers 2:18</p> <p style="text-align: center;">n</p> <p>name 2:2 10:19,22 10:25 11:11,15 17:7 39:5 42:9 53:8 56:12 63:20 69:4 name's 11:4 42:4 nation 12:3 76:25 national 1:3 2:4 6:25 13:1,4 14:13 nature 50:18 70:17 nearly 32:23 necessarily 29:13 38:21 39:2 67:15 necessary 28:8 31:7 32:24 36:8 46:2 47:8 50:9 54:6 73:15 75:10 necessity 53:13,19 73:20 need 5:12 8:19 16:19,19 20:22 21:5 22:11 27:5 34:23 41:25 53:19,25 56:11 58:7,24 60:14 62:19 64:11 65:20 67:8,9 73:3,4 76:8 needed 4:23 24:8 43:1 60:2 72:11 74:9,14 needs 4:17 21:6 40:1 64:16 never 35:12 76:22 new 19:5 25:14 31:16 42:15 45:5,7 45:10,13 46:17 69:16 70:14,21 73:12 nice 15:1,3,9</p>

<p>nigc 2:12 4:17 6:14 12:23,25 20:13 32:18 47:5,5 57:17 63:10 68:25 70:1,9 71:9 nigc's 71:2 nigc.gov. 9:3 nimish 2:18 19:7 20:8 28:6,20,24 33:23 40:9 41:13 normal 36:20 north 13:20 notary 78:3,23 note 26:15 notice 4:14,21 5:8 6:3,24 9:9,24 18:5 18:11 22:17 24:11 24:18 25:24 30:17 33:15 34:19,20 38:11 56:20 60:23 61:8,20,25 62:25 68:25 notification 23:2 31:16,24 32:3 notified 38:12 november 24:23 25:3,9,10 nprm 54:2 number 8:12 27:2 28:19 29:3,13,25 30:8 numbers 35:14</p>	<p>38:18 40:24 office 2:15,17,21 17:7 75:19 officer 12:25 officials 8:18 oh 57:1 okay 16:16 33:22 42:2 45:12 53:16 55:21 56:4 57:6,9 60:16 69:10 70:12 75:6 oklahoma 12:7 34:11 olujic 12:17,18 once 10:3 61:18 oneida 1:7 3:4,16,17 3:25 11:7,8,14,16 12:12,14,16,19,21 13:11 14:11 56:15 56:15 65:3 69:6 78:9 ones 13:25 20:21 40:8 ongoing 58:6 online 9:2,6,8 open 7:20 16:14 34:6,7 45:14 53:2 60:18 62:8 64:20 67:21 69:2 73:1 opening 3:4 operate 23:23 35:22 operating 23:17,20 23:22</p>	<p>operator 41:7 operators 20:16 opportunities 34:14 opportunity 44:13 54:12 67:12,22 68:5 option 32:23 optionals 31:12 options 25:22 orcutt 12:20,21 56:9 56:14,14,21 57:1,6 57:9 order 7:24 8:11 ordinance 42:7 organization 9:15 10:20 39:6 53:8 56:13 69:5 original 25:19 originally 45:17,18 outdated 71:6 outline 71:2 outside 63:9,21 overall 14:18 35:10 overhead 49:6 overly 29:12 overseeing 14:2 overwhelmingly 61:6</p>	<p>participating 7:10 particular 22:9,10 41:9 58:17 61:16 62:18 63:19 particularly 6:2 69:12,18 parties 78:15 parts 4:25 5:9 6:4 8:11 18:25 24:14 38:4 66:4,4 patron 38:12 43:5 49:24 patrons 37:6 paul 42:6 paxton 2:17 payments 51:1 payout 47:25 48:2,7 people 74:2 pequot 6:11 perform 23:16 period 6:6 16:10 17:22 25:2,4,6,14 25:18 26:2 32:24 34:6,7 52:6 54:13 54:18 55:11,16,17 55:18 58:19 59:5 62:4 67:21</p>
<p style="text-align: center;">o</p>	<p>operation 13:22 26:11 37:5 46:5 47:19 49:21 50:20 59:4,5 62:18 71:15 73:15 operational 58:18 59:11 operations 4:8 14:2 25:22 45:20,23 46:4 58:2,15 59:18 62:23 64:8 66:7 75:1</p>	<p style="text-align: center;">p</p> <p>p.m. 77:5 78:12 page 32:4 paper 17:16 61:23 par 41:4,5 parents 13:24 part 2:6,6 5:2,5 10:8 10:10,14,15 22:14 23:25 32:8 33:12,25 36:8 42:10,12 44:19 44:21 46:9 60:23 64:15 69:1 70:9,17 70:21 71:12 participate 7:19 35:25 43:17 49:15 63:13</p>	<p>person 42:22 personal 78:7 personnel 42:23 55:2 perspective 58:14 59:2,2,11 pertain 63:12 phonetic 11:16 71:1 physical 51:6 52:2 piece 17:16 place 28:8 46:24 placed 40:23 planning 68:4 play 10:9 43:17 49:15,17,18 63:13 63:13 played 61:22</p>

<p>player 27:1,24 31:23 47:24 49:7,12,15 50:2,4 63:7</p> <p>please 17:13 30:14 37:25,25 44:15 46:5 53:7 54:20 55:25 56:1,13 60:21 63:3 65:11 66:9 68:20,21 73:8</p> <p>point 2:13 32:3 34:17 39:21 44:12 44:14 58:13 59:14 74:18,22 75:1</p> <p>pointed 35:16 40:18 60:5 64:12 65:1</p> <p>pointing 65:5</p> <p>points 18:10 75:2</p> <p>policies 8:13</p> <p>policy 8:9</p> <p>pool 49:7</p> <p>position 74:12 75:9</p> <p>positive 41:18</p> <p>possibilities 25:23</p> <p>possibility 69:12</p> <p>possible 8:15 16:25</p> <p>posted 66:18 67:25 68:15</p> <p>potawatomi 11:19 11:23 12:1</p> <p>potential 63:23 75:17</p> <p>potentially 25:5 65:6,11,14</p> <p>powerpoint 7:14 17:4,12 18:7 34:18</p> <p>practicability 73:20</p> <p>practice 55:9</p> <p>preamble 24:19 66:15,18 72:17</p> <p>preambles 75:14</p> <p>preceding 78:5</p> <p>preclude 73:17</p> <p>preliminary 56:21 73:10</p>	<p>prepare 34:5</p> <p>prepared 16:10,14</p> <p>preregulator 15:6</p> <p>presentation 7:14 17:5 40:18 44:16</p> <p>pretty 29:3</p> <p>previous 50:20</p> <p>pride 14:17</p> <p>primarily 42:5</p> <p>prior 6:9 65:25</p> <p>priorities 4:5,11</p> <p>priority 4:12 13:23</p> <p>prize 19:17 31:22 48:11 63:19</p> <p>prizes 47:23</p> <p>probability 40:20</p> <p>probably 8:21 9:6 15:2 16:22 17:2 24:5 41:22 42:7 57:4,23 66:10 70:21</p> <p>problem 64:1 65:15</p> <p>problematic 72:20</p> <p>problems 32:1</p> <p>procedural 47:17,21 50:18</p> <p>procedure 52:17 54:2</p> <p>procedures 45:1,3 48:24 49:5,22 50:12 52:9</p> <p>proceedings 2:1 77:5</p> <p>proceeds 43:9,11</p> <p>process 6:15 7:11 8:24 33:16,17,19 43:12 58:6</p> <p>products 40:6</p> <p>program 8:13</p> <p>programmable 19:9</p> <p>progressive 22:23</p> <p>prohibit 50:3</p> <p>project 14:15</p> <p>promote 43:3</p> <p>promotion 43:15 49:13 63:17</p>	<p>promotional 51:1</p> <p>promotions 43:16 49:12,14 63:8,15</p> <p>pronouncements 70:14</p> <p>proposed 5:8,17 6:3 6:24 9:9,22,25 18:6 18:13 22:18 24:6,11 24:18 25:24 29:21 30:17 33:14,15 34:20 38:11 39:11 42:14,19,21 43:4 56:20,24 57:8 60:24 61:9,21 62:1 63:1 71:12 75:14</p> <p>proprietary 20:5,7 21:11</p> <p>protect 37:5,6 59:3 72:25 74:15</p> <p>protecting 59:6,6</p> <p>protections 71:14</p> <p>proud 3:24 5:11 8:20 13:12 14:10</p> <p>provide 5:24,25 6:21 44:22 49:9 50:19 54:13 60:7 68:9 70:20 74:20 75:3</p> <p>provided 6:17 51:18</p> <p>provides 27:22</p> <p>providing 28:13 67:11 77:1</p> <p>provision 24:1,3,10 26:3 34:16,24 36:17 37:19 48:19 50:8 58:17 65:23 70:8</p> <p>provisions 43:2,5</p> <p>public 7:20 19:21 26:14 27:3 46:21 47:10 51:12,25 78:3 78:23</p> <p>publish 6:3</p> <p>published 4:21 6:5 17:18 18:3 34:3 39:9 67:18,19 74:7</p>	<p>pull 48:10,11,14,17 48:20,25 52:19 63:15</p> <p>pulled 48:21</p> <p>purohit 2:18 19:9 20:11 22:23 29:1 39:17 40:16</p> <p>purpose 59:3,4 74:5</p> <p>purposes 59:8</p> <p>put 6:21,23 13:10,25 18:5,17 19:13,22 20:2 23:22 28:15 31:4 42:8 61:10,14 63:20 64:25 67:1</p> <p>putting 20:18 46:24</p> <p style="text-align: center;">q</p> <p>qualify 25:12</p> <p>question 30:19,22 33:23 35:2 36:9 45:16 51:15 55:5 70:2 72:8</p> <p>questions 17:12 20:14 24:20 33:21 34:21,22 35:11 38:25 44:9,14 53:3 63:2 66:17 69:8</p> <p>quick 15:15 20:12</p> <p>quicker 16:22</p> <p>quickly 16:1 70:19</p> <p>quote 26:16</p> <p style="text-align: center;">r</p> <p>raised 62:13 63:6 65:24</p> <p>raising 74:22</p> <p>random 28:19 29:3 29:13,25 30:8</p> <p>ranks 65:5</p> <p>rationale 66:20 67:6</p> <p>reach 58:8 59:13</p> <p>read 9:11,18,18 66:22</p> <p>readable 19:10</p> <p>reading 56:17 65:16</p>
--	---	---	---

<p>real 14:14 realized 21:12 really 5:25 6:18,21 15:3,13 26:19 34:23 35:12,18 37:20,20 40:13 46:23 54:5 58:11 59:14 62:14 62:24 64:24 65:15 66:14 67:16 73:12 77:2 reamble 30:18 reason 28:7 reasonable 55:11 57:20 58:19 reasonableness 57:20 reasoning 63:11 66:20 67:6 72:18 reasons 59:24 64:3 73:25 74:8 75:10,15 recall 27:19 recap 5:4 7:15 receive 49:8 55:10 61:2 65:17 received 6:7 29:16 41:10 44:1 48:16 50:8 receiving 55:20 63:14 recognize 5:13 recognized 76:21 recognizes 44:22 recommendation 42:17 52:13 55:7,13 reconcile 48:17,25 reconciliation 49:2 reconciling 48:14 record 3:9 8:25 16:12 56:13 60:21 recorded 51:1 78:6 recording 8:25 49:23 records 54:25 recovery 59:8</p>	<p>redeem 48:17,25 redeeming 48:14 redemption 49:2 reduced 78:6 reduces 57:22 reference 50:1 52:24 referenced 51:15 references 27:15 referencing 51:16 referring 29:6 61:19 reg 18:23 19:24 64:14 66:16,17 67:18 regarding 33:24 regardless 35:24 61:22 regards 2:10 region 14:16 42:5,6 regional 2:15 7:3 register 17:18,19,22 17:25 56:25 regs 33:12 67:19 regulating 71:10 regulation 1:4 7:6 24:14 35:6 36:11 70:3 71:6,12 72:17 regulations 4:16,22 5:5,16 26:17 39:11 44:22 57:17 58:5 59:19 69:1,16,25 70:1,15 73:12,16,25 74:4,8,13 75:10,12 75:13,16,20 regulator 12:6 40:24 41:7 76:7 regulators 58:1 59:12 regulatory 2:5 4:8 4:12,21 10:7 20:16 21:7 22:1 23:6,8,9 23:14 25:1,16 30:3 57:25 58:15 59:2 68:25</p>	<p>reinserted 19:20 reiterate 30:13 73:14 relate 52:23 relates 13:13 relationship 4:6 relative 78:14,15 relatives 13:12 14:12 remarks 3:5,20 remedy 65:14 remember 19:8 66:25 remind 44:13 75:1 remote 51:7 removal 49:4 remove 21:15 22:18 removed 20:1 27:14 35:9 48:21 50:1,5 51:24 removes 27:8 28:5 removing 25:4 38:8 reorganizations 18:14 repairs 26:8 repeal 5:7 repeating 8:22 replace 23:1,1 replaced 40:25 66:5 replacements 26:8 report 23:5 30:21 reported 1:21 30:3 reporting 52:9 represent 10:20 reprogramming 38:20 request 23:9 35:11 49:11 59:25 requested 69:7 requesting 4:16 24:16 require 25:25 38:12 38:15,19 49:14 63:17 66:3</p>	<p>required 26:7 32:8 48:4 49:1 66:6 69:24 70:8 requirement 22:19 22:21 23:2 25:13 26:13 27:20 28:5,22 29:23 31:16,21 40:19,21,25 51:24 requirements 21:8 29:5 40:20 43:23 52:12 62:17 74:24 requires 23:3,6 26:20 28:12 47:18 47:23 49:20 50:23 51:20 52:8 requiring 26:1 40:11 43:17 reserved 47:16 reset 24:7 resolve 44:7 respect 39:8 response 42:21 47:10 48:15 responsible 21:22 rest 2:22 70:23 restate 55:25 restrictions 40:23 restroom 60:13 result 37:14 results 23:7,12 retention 52:6 54:18 55:11 58:19 59:4 62:4 retested 38:16 reuse 58:24 revenue 52:14 review 1:4 2:5 4:9 4:12,21 6:22 9:2,19 10:7 11:1 34:22 39:3 47:6 49:4 67:20 68:15,25 73:12 reviewed 4:18 5:5 9:7,11 18:4 42:22 67:14</p>
---	---	---	--

<p>reviewing 52:1 71:5 reviews 9:19 reynolds 12:9,9 right 9:17 14:23 16:13 18:17 22:20 22:22 40:3 41:13 55:4 56:18 57:4 59:20 70:5 71:19 72:12 73:18 74:17 76:5,16 rise 64:1 risk 63:23 rng 31:1,3 road 45:22 rob 12:20 56:14 robust 36:1 role 44:23 71:2,9 ron 12:5 room 10:19 49:10 51:21 58:22 60:13 round 20:13 rpr 1:21 78:3,23 rule 5:17,17 9:22,23 18:13 24:6 34:21 35:3 38:11 42:14,21 43:4 45:4 56:24 57:8 61:21 62:1 63:1 75:14 rulemaking 5:8 6:3 6:15 9:9 18:6 22:18 24:11,19 25:24 30:17 56:20 60:24 61:9 rules 6:24 9:25 17:17 18:20,22 22:13 27:22 31:15 32:4 runs 31:9 russ 70:19</p>	<p>saw 61:25 saying 30:20 33:2 48:16 59:17 scaling 30:1,11 scheduled 16:22 34:10 41:23 schedules 16:8 schreiber 11:18,19 seat 15:17,20 seats 15:18 second 43:22 44:3,6 72:8 seconds 3:23 secrecy 50:3 section 18:16,19,24 19:4 21:17,23 26:23 28:1 30:11 31:2 32:9 40:18 43:3,7 43:14 44:18 45:23 47:9,14,15 48:10 49:9 50:9,18,23 51:9,11,14 52:1,8 52:12 55:24 56:3 61:10,25 64:12 72:3 section's 33:19 sections 18:14 30:18 34:1 47:12 52:4,17 52:21,24 53:1 71:24 secured 48:22 security 51:6,7 55:2 see 3:22 9:6,24 15:11 17:14 18:11 20:4 22:25 24:11,18 33:15 41:19 42:1 46:3 47:21 51:5 52:23,25 59:12 60:15 61:8 65:10 72:22 seen 64:1,2 68:8 senator 14:20,20 send 2:10,11 67:23 68:21 sense 18:17 sent 4:15</p>	<p>separate 33:17 separated 52:15 serial 27:1 31:9 seriously 9:11 61:2 serve 47:24 48:1,8 74:15 server 51:25 72:11 72:19 73:1,6,15 server's 72:19 servers 52:3 service 14:18 services 49:19 session 76:15 sessions 67:24 set 4:13 24:20 25:14 26:15 31:8 78:19 sets 21:24 22:15 setting 26:18 share 60:16 sheet 41:4,5,6 69:15 69:18 sheets 40:11 shifts 41:9 short 16:10 60:17 shown 27:21 side 5:20 6:12,13 8:4 27:6 41:4 46:13,13 58:1,2 72:6 signature 47:25 48:2,9 signatures 48:5 significant 44:23 58:25 similarly 26:6 simplified 50:17 simply 31:21 single 9:13 30:22 sir 39:4 53:7 56:7,11 57:11 69:3 70:10 75:7 sisters 13:20 sit 13:10 14:23 15:20 skip 26:23 28:2</p>	<p>slide 10:5 22:25 slot 11:7 slots 65:2 small 24:13 45:17 45:23,25 46:4 software 23:13 27:13 28:14 69:19 sole 48:1 somebody 35:15 somewhat 13:10 son 14:8 soon 8:25 33:3,7 sophisticated 62:19 sorry 29:9 45:12 57:1 71:1 sources 42:16 space 58:24 speak 39:2 68:6 specialist 11:12,14 11:17 specific 21:8 25:21 28:23 30:19,24 34:21 40:7,24 49:21 58:21 63:16 64:16 66:4 specifically 44:4 63:17 70:7 specifications 23:17 23:19,20 specificity 30:12 40:2 specifics 37:22 specifies 52:16 specify 30:15 specifying 29:23 spell 54:2 63:11 spend 67:2,3 spent 5:24 66:24 split 61:5 spot 64:25 spur 44:17 square 31:8 ss 78:1 st 12:9 42:6</p>
s			
<p>safe 68:11,20 76:24 77:3 sarah 2:23 60:5 74:21</p>			

<p>staff 2:12,18 5:13,18 9:19 10:17 12:22 32:20 38:25 42:4 65:21 66:24 76:20 76:23 standard 10:8 19:10 19:11 22:8 26:19 30:23 32:8,15,16,25 33:6,11 36:12 46:8 46:11,17,20,25 47:1 47:4 49:5 53:12,18 53:20 54:21 55:8 62:22 64:16,19 standards 2:7 5:1 8:16,18 10:8,11 17:10,11 18:20 19:13 20:23 21:22 21:25 22:1,7,16 26:15,25 27:13 28:3 28:10,17,19 31:14 41:8 42:11 44:19 45:1 49:13 53:14 54:16 63:25 71:13 71:23 72:4 74:23 standpoint 58:18 70:2 stands 19:8 start 1:23 7:13 14:1 41:22,25 42:10 started 3:2 10:16 13:25 14:8 starts 14:22 state 22:12 34:13 39:5 53:8 56:12 69:4,24 78:1,4,23 stated 65:7 statement 16:11,19 statements 16:15 34:5 stay 18:15 steffani 2:9 step 3:8,19 63:3 stevens 2:9 13:6,7 15:1</p>	<p>stick 15:24 sticking 76:14 storage 43:10 strict 29:12 stricter 22:2 62:22 stringency 69:17,23 stringent 69:15 70:1 70:4,22 72:5 strongly 66:14 stuck 74:19 stuff 19:15 71:25 submission 25:15,17 submit 16:11 17:25 18:1 23:10 32:16 34:8 35:4 41:6 73:8 submitted 9:4,5,14 23:7 25:6,8,11 33:8 38:9 39:20 submitting 41:3 subpart 33:13 subsequently 29:10 substantive 26:22 27:25 31:13 39:15 sudden 46:17 sufficient 43:21 51:20 62:11 suggested 30:9 suggesting 55:10 sujerak 11:15,16 summary 9:23 sunset 34:24 36:17 37:19 supervision 43:2,5 49:9,10 supreme 70:25 sure 16:23 19:22 23:18 36:2,21 37:4 37:6,8,15 40:16 42:24 62:2 64:2 67:5 68:3 70:19 71:16 75:3 surveillance 43:6 51:19,23,24 52:6 54:18,21,24,25 55:12,19 72:10,18</p>	<p>73:6 suspected 52:9 55:1 suspicious 52:10 55:1 swallowed 46:1 system 20:5,7,8,18 21:5,9 28:4,12,15 35:4 38:13 39:22 47:15 51:8,11,15 54:4 66:5 systematically 37:17 systems 20:19,20,22 21:18 24:21,25 25:5 25:18 26:9 27:14 29:14 35:1,6,17 36:19,25 37:2,14,23 37:25 38:16,18 41:19 47:11 49:16 49:25 51:10,17,22 52:4,18 66:9,11</p> <p style="text-align: center;">t</p> <p>table 8:4 15:18 tables 15:8 51:21 tabs 48:10,11,15,18 48:20,25 52:19 tac 42:17 51:5 52:13 tahsuda 12:7,7 take 8:8 14:17 15:9 24:6 39:3,19 44:12 46:3 58:23 61:2 taken 21:14 22:24 24:22 32:2 49:7 60:17 68:23 78:9 takes 9:15 talk 3:11 4:13,25 5:15 10:6,14,15 13:15,16 17:9 18:6 18:7,12 20:9 28:20 28:24 32:10 40:12 40:14 46:16 54:16 62:3 63:5 65:20,22 65:25 76:1 talked 7:21,22 29:11 31:16 34:1,15 62:9</p>	<p>talking 28:6 46:17 46:24 51:14 63:7 talks 18:19 47:22 tammy 12:13 tapes 58:20,23,24 team 13:12 14:3 teams 76:4 technical 2:7 4:7 5:1 10:8 17:11 18:20 19:15 26:24,25 27:13 28:3,18 29:4 61:23 technology 22:6,7 44:3,8 48:16,18 51:3 65:6,9,11,13 70:18 71:7 tell 13:14 19:7 telling 29:2 ten 57:15 term 20:6 46:19 terminology 19:11 test 23:3,7,12 26:12 26:14 29:18,20 31:9 31:9,9,10 40:5,5 41:2 testable 28:16 29:24 tested 20:23 21:6,6 22:11 26:21 35:8 41:2 testing 25:9 31:3 35:4,8 52:17 tests 31:7,12 tgra 23:18,25 26:16 26:20 28:5 31:11 32:7,15 33:1,4,7,8 41:18 44:20 47:3,18 48:23 49:20,22 50:19 52:8 73:14,17 tgras 44:23,24 49:3 74:23 75:11 tgwg 52:20 thank 3:15,18 4:2 6:24,25 7:10 9:20 10:3 14:25 19:14 25:10 56:5,7 59:15</p>
---	---	---	---

<p>59:16,21,22 65:18 68:11,19,21 75:6 76:10,11,13,18,19 76:23,24 77:3 thanks 20:11 29:1 33:22 41:13 57:9 74:21 theft 59:8 thing 9:8,17,22 15:22 18:12 21:16 23:25 41:17,18 things 7:15,21 13:17 15:15 27:19 32:21 38:24 42:20 57:16 57:25 58:9 60:20 61:13 64:17 72:2 76:8 think 2:16 3:1,11 8:19 9:9,16 10:17 13:9 14:4 15:4 17:20 20:4 32:12 33:13 34:12,16 37:9 37:13 38:5 39:14,14 39:15 40:7,10 53:5 53:21,24 54:11 64:17 65:20 66:9 68:16 70:16 73:3 74:9 thinking 10:1 39:1 60:10 61:15 third 8:16 thorough 35:13 thoroughly 34:4 36:6 67:13 thought 18:16 36:7 36:15 41:14 46:19 thoughtful 10:4 thoughts 60:15 64:20 three 25:2 32:13 threshold 49:23 thresholds 44:25 throw 38:25 59:24 time 1:23 4:18 5:23 6:20 9:15 15:4</p>	<p>16:10,12,18 18:3 20:24 25:4,14 26:2 32:22,23 34:4,9 35:9 53:23 54:11,12 56:5 61:20 66:25 67:3 70:18 times 6:16 8:4 14:20 72:19 76:3 today 2:14 4:1,13,25 5:20 6:2 7:12 13:9 29:2 39:2 68:12 top 19:17 31:22 topics 51:4 tracie 2:8 track 49:17 tracking 49:13,15 63:7 tradition 45:22 training 4:7 transcript 2:1 68:14 transcriptionist 8:24 transparent 8:23 traveled 16:8 travels 68:11,20 76:24 77:3 tribal 1:5 7:16,18,25 8:18 11:9 14:9 15:16 16:7 20:15,16 21:7,25 23:5,7,8,14 23:24 25:22 26:10 29:22 30:3 31:5 40:23 41:7,7,11 42:18 55:6,12 59:11 61:4 62:6,13 63:6 64:5 69:7 tribe 3:4,16,17 4:1 8:2 9:15 35:3 74:16 tribes 4:15 5:21,24 6:13,16,21,25 7:5 7:10,18 8:6,12,15 35:24 37:1,11 38:9 44:18 46:7 50:12 55:17 61:7 67:12</p>	<p>tried 21:2 63:15 trimble 1:21 78:3,23 try 15:24 29:4 58:3 63:22 trying 21:3 35:9 58:16 67:5 tumbler 63:20 turn 3:2 10:13 15:22 17:3 turning 19:16 two 4:4,10 6:1,4 9:24 32:12 40:7 44:8 48:4 53:5 type 35:24 55:19 63:18 types 62:15</p> <p style="text-align: center;">u</p> <p>unbiased 28:23 unchanged 52:21 unclear 30:13 understand 8:7 16:20 34:2 35:10,23 36:1 54:15,19,23 58:4 59:1 66:11 67:17 understanding 35:13 38:2,17 57:18 57:20 70:25 understands 35:20 underwriter's 27:9 undue 37:16 unenroll 19:19 unfortunate 3:21 unfortunately 3:12 15:8 uniform 33:19 united 76:25 universal 32:14 unnecessary 43:12 50:14 unrestricted 50:2,4 updated 70:17 upgrade 58:25</p>	<p>use 6:23 37:3,7 42:22 46:8 60:12 64:8 77:1 utilized 64:11</p> <p style="text-align: center;">v</p> <p>validate 48:9 vanchism 12:13,13 variance 32:9,12,15 46:12,13,16 53:12 53:18 variances 44:25 varied 58:3 various 45:1 vault 50:21 51:21 69:18 vegas 74:7 verification 47:23 48:11 verified 28:15 50:25 verify 23:4 verifying 47:25 48:1 48:8 versa 14:16 version 29:7 versus 53:18 viable 37:2 vice 2:9 14:15 video 39:24 vieux 11:1 12:5 view 39:22 59:14 vital 14:14 voice 14:15 vote 17:17 voucher 20:8</p> <p style="text-align: center;">w</p> <p>wait 44:15 63:4 want 2:4 3:2 6:24,25 7:9 9:20 10:3,18 13:7 15:15,16,19,19 16:11,23 36:2 37:3 37:3,3,6,8,14,15 38:3,25 39:3 44:12 44:13 46:2 57:13 60:9,15,20 63:2,3</p>
---	--	---	--

<p>63:22 64:21 65:8 67:15 68:2 69:3 70:23 75:8 76:18,19 76:23,24 wanted 2:13 3:14,18 20:4 24:9 48:6 53:6 62:2 wants 33:24 ward 2:21 10:15 42:3,4 45:12 53:16 53:21 54:24 55:22 56:2,6,24 57:3,7,10 washington 34:13 way 6:1 36:20 57:22 58:3 65:8 70:4,18 ways 21:14 32:13 57:24 65:12,14 we've 4:9 5:5,16 7:21 8:19 9:25 13:13 15:25 24:6 28:21 32:1,19 34:18 35:14 36:10,22 37:9 41:23 48:12 50:1,22 63:25 website 9:2 17:20 67:25 68:15 week 34:11,12 welcome 2:5 3:14,14 3:18 13:8 14:24 34:8 56:6 57:10 went 5:6,7 6:19 29:7 30:7 west 2:22 45:10 71:23 whereof 78:19 white 12:5,5 william 12:11 winders 39:24 winter 4:20 wisconsin 1:9 3:4 13:21 69:25 78:1,4 78:10,20,23 wish 2:10 68:10 76:24</p>	<p>witness 78:19 wonderful 15:12 wondering 45:25 word 21:11 31:25 42:25 46:22 work 5:11,13,19 7:4 12:13 14:7 16:2 41:20 70:24 76:2 worked 6:10 8:2 29:18 36:19,20 working 42:7,18 55:6,13 works 7:8 33:16 42:5 59:13 world 57:24 worth 8:22 write 9:16 writing 78:6 written 9:5 34:8 57:21 65:16</p>
	y
	<p>yeah 53:17 56:23 57:3 66:23 year 34:25 36:17 37:20 45:8 52:6 54:18,22 58:18 60:3 62:5 years 4:4,10 15:4 25:3 36:23 57:16 74:6 yolanda 10:25</p>