



PAWNEE NATION GAMING COMMISSION

Post Office Box 514
Pawnee, Oklahoma 74058
Phone: 918-762-3378
Fax: 918-762-3395

February 19, 2020

RE: Notice of Proposed Rulemaking

This Letter is public notice of proposed rulemaking that affects the Tribal Internal Control Standards intended to regulate Casino Operations and associated business.

Affected Regulation

PNGC Tribal Internal Control Standards

Section 4a. Casino Compliance

5. Compliance

A. SICS. Each tribal gaming operation shall develop a System of Internal Controls (SICS)

that, at a minimum, complies with these TICS.

1) Casino Operations Management and Organization Chart

a) Each facility's internal control system shall also include the following departments and supervisory positions, each of which shall be categorized as mandatory and shall cooperate with, yet perform independently of, other mandatory departments and supervisory positions of the facility manager. However, a department or supervisor of a facility that is not required or authorized by this subsection may operate under or in conjunction with a mandatory department or supervisor if the organizational structure is consistent with the requirements of the ordinance and subsection (a). The mandatory departments and supervisory positions shall be the following:

- i) A surveillance department supervised by a person located at the gaming facility who functions, for regulatory purposes, as the "director of surveillance"*
- ii) an internal audit department supervised by a person located at the gaming facility who functions, for regulatory purposes, as the "director of internal audit":*

At a regularly scheduled meeting on Tuesday, February 18, 2020, the Commission recommended approval for the following policy changes:

- Define administration of certain departments

Proposed Changes

- i) A surveillance department supervised by a person located at the gaming facility who functions, for regulatory purposes, as the "director of surveillance"*

(1) This Department shall be functionally and logistically administrated by the Pawnee Nation Gaming Commission and directly supervised by the Support Staff of the PNGC.

ii) an internal audit department supervised by a person located at the gaming facility who functions, for regulatory purposes, as the “director of internal audit”:

(1) This Department shall be functionally and logistically administrated by the Pawnee Nation Gaming Commission and directly supervised by the Support Staff of the PNGC

Please send your comments to our office at the following address before close of business Monday, March 23, 2020:

Pawnee Nation Gaming Commission
Post Office Box 514
Pawnee, Oklahoma 74058

We will accept electronic correspondence at the following e-Mail address:

aattocknie@pawneenation.org

-Please include “Rulemaking Comment 20-003” in subject line

Thank you in advance for your time and constructive comments.

Sincerely,

Arthur L. Attocknie
Director

Pawnee Nation Gaming Commission