



GAMBLING CONTROL COMMISSION

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October 20, 2008

Tribal Chairperson
Compacted Tribes

Re: Notice of Re-Adoption of Uniform Tribal Gaming Regulation CGCC-8 (Minimum Internal Control Standards); 30-day comment period

Dear Tribal Chairperson:

At its meeting of October 14, 2008, pursuant to Compact section 8.4.1(b), the California Gambling Control Commission (Commission): (1) readopted Uniform Tribal Gaming Regulation CGCC-8 (Minimum Internal Control Standards) in the amended form dated October 1, 2008 and (2) adopted the Detailed Response to Tribal-State Association Objections to CGCC-8 dated October 9, 2008.

By way of background, the original form of CGCC-8 was disapproved by the Association of Tribal and State Gaming Regulators on September 4, 2008.

At the October 14, 2008 meeting, it was brought to the Commission's attention that Picayune Rancheria of the Chukchansi Indians, United Auburn Tribal Gaming Agency, Cher-Ae-Heights Indian Community of the Trinidad Rancheria Gaming Agency, and Jackson Rancheria Tribal Gaming Agency, had prepared letters which were not included in the exhibits to the Detailed Response.¹ Copies of these additional letters have been obtained and reviewed; they are included in the Supplement to the Detailed Response, dated October 20, 2008. No new arguments were made in these four letters. However, the arguments are summarized and responded to in the Supplement.

¹ It appears that the Commission was not provided with a complete copy (including attachments) of the Association minutes for September 4, 2008. A complete copy was received, however, on October 15, 2008.

Attached for your review and comment are three documents:

1. The amended form of CGCC-8 dated October 1, 2008
2. Detailed Response to Tribal-State Association Objections to Minimum Internal Control Standards (MICS) (CGCC-8), dated October 9, 2008
3. Supplement to the Detailed Response dated October 20, 2008.

As provided in Compact section 8.4.1(c), your Tribe has 30 days from the date of this notice to submit comments on CGCC-8 to the Commission. All such comments will be reviewed and considered by the Commission in accordance with Compact section 8.4.1(c).²

Please submit any written comments regarding the re-adoption of CGCC-8 from your Tribe to the California Gambling Control Commission (Attention: Evelyn Matteucci, Chief Counsel). Comments submitted via U.S. Mail or overnight delivery should be sent to the Commission address shown above. Comments submitted by fax should be sent to 916-263-0452. Email comments will be not accepted.

To be considered, comments concerning the readoption of CGCC-8 must be received at the offices of the Commission no later than 5 p.m., Thursday, November 20, 2008.

Sincerely,

Evelyn M. Matteucci
Chief Counsel

² Section 8.4.1 (b) and (c) of the Compact provides:

- (b) Every State Gaming Agency regulation that is intended to apply to the Tribe (other than a regulation proposed or previously approved by the Association) shall be submitted to the Association for consideration prior to submission of the regulation to the Tribe for comment as provided in subdivision (c). A regulation that is disapproved by the Association shall not be submitted to the Tribe for comment unless it is re-adopted by the State Gaming Agency as a proposed regulation, in its original or amended form, with a detailed written response to the Association's objections.
- (c) **Except as provided in subdivision (d), no regulation of the State Gaming Agency shall be adopted as a final regulation in respect to the Tribe's Gaming Operation before the expiration of 30 days after submission of the proposed regulation to the Tribe for comment as a proposed regulation, and after consideration of the Tribe's comments, if any. (Emphasis added.)**