

Seminole Nation Gaming Agency
Policy and Procedures
Licensing

Section 100. Purpose

- A. The Seminole Nation Gaming Agency (SNGA) Licensing Department's main function is to ensure that all of the following are properly licensed by the Gaming Agency within the standards set forth in the Seminole Nation Tribal Gaming Ordinance (Title 15), Seminole Nation Tribal Internal Control Standards (TICS), Oklahoma State Compact, Indian Gaming Regulatory Act (IGRA), National Indian Gaming Commission (NIGC), and any other applicable laws:
1. Employees (Key and Non-Key);
 2. Vendors (licensed or registered);
 3. Gaming Devices (Class II and Class III); and
 4. Gaming Facilities (where Class II or Class III gaming is to be conducted)
- B. The SNGA Licensing Department is responsible for the following:
1. All Seminole Nation Gaming Employees are properly licensed.
 2. All Vendors are properly licensed.
 3. Ensure all SNGA issued gaming licenses are valid and never become delinquent.
 4. The gaming facility does not employ any employee who has not received either a temporary or regular Key License or licensed as a Primary Management Official (PMO).
 5. Creating and maintaining a database outlining all current gaming license holders for Employees and Vendors. The database will also include the issued date and expiration date for each license holder.
 6. At least quarterly, SNGA Licensing Personnel shall conduct onsite visits at all three Seminole Nation gaming facilities to perform spot checks on Employee and Vendor gaming licenses to ensure they are valid and prominently displayed.
 7. At least two (2) weeks prior to the expiration date of each Employee's gaming license, the Licensee shall contact the SNGA Licensing Department to schedule an appointment for renewal.
 8. Issuing the Seminole Nation Gaming Enterprise (SNGE) management personnel a current copy of the SNGA Vendor licensing list on a monthly basis.
 9. Gaming Facilities are properly licensed in accordance with facility licensing standards.
 10. An invoice request will be created and sent to the SNGA Administrative Services Coordinator for an invoice to be created.
 - a. Facility Licensing Fees;
 - b. Employee Licensing Fees; and

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c. Vendor Licensing Fees.

C. The Employee license holder is responsible for the following:

1. Maintaining a valid gaming license.
2. Ensure gaming license is always visibly worn and prominently displayed while on SNGE gaming premises.
3. If an Employee license holder fails to appear at their scheduled renewal appointment and/or their gaming license expires, unless a valid reason is given, the employee's gaming license will automatically be revoked. The employee will not be able to obtain a SNGA issued gaming license for one (1) calendar year. A notification will be sent by the SNGA Licensing Department to the Employee's Supervisor, Department Manager, and Human Resources representative.
4. Depending on the circumstances, at the CGR's discretion, a suspension of gaming license may occur in lieu of a revocation for an expired gaming license for a period of time determined by the CGR.

Section 101. General

- A. Applicants whose prior activities, criminal record, reputation, habits, and associations pose a threat to the public interest or to the effective regulations of gaming, or create or enhance the dangers of unsuitable, unfair, or illegal practices and methods and activities in the conduct of gaming shall not be eligible for employment or to do business with the Tribe's gaming enterprises.
- B. It is the duty and responsibility of each person associated with the Nation's Gaming to conduct themselves with integrity, honesty, and with the decorum and manners necessary to reflect positively on the Nation and its members.
- C. Applicants or licensees, who fail to abide by these standards, or violate Nation rules, laws, customs, or traditions, or other applicable laws or regulations, are subject to Commission sanctions including suspension, revocation, or denial of the gaming license.
 1. Any gaming license which is issued shall be deemed a privilege and is subject to suspension or revocation.
 2. No license should be issued by the SNGA which would place the Nation in violation of the Indian Gaming Regulatory Act (IGRA), the Seminole Nation Tribal Gaming Ordinance, the Oklahoma State Compact, or of any applicable Federal law.

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- D. The SNGA Suitability Criteria as outlined in Section 203 of Title 15 for the Denial, Suspension or Revocation of Gaming License should be the official guideline used for suitability determinations, along with the Seminole Nation Gaming Ordinance, State Compact, and NIGC Regulations.
- E. The Seminole Nation Gaming Commission's decisions regarding the issuance of gaming licenses shall be final and effective when issued.
 - 1. An appeal process is available through the Gaming Commission.
 - 2. All decisions made by the Gaming Commission are final.
- F. All key employee suitability determinations and corresponding documentation shall be submitted to the NIGC within sixty (60) calendar days of date of hire.
- G. Key Licenses shall be issued for a two (2) year period, which must be renewed prior to expiration.

Section 102. Access to Information

- A. The SNGA shall have access to any records, evidence or information regarding an applicant for license or licensee upon proper and lawful demand by the appropriate Tribal, State or Federal agency.
- B. The SNGA shall have immediate access for inspection of all papers, books, and records produced by any Seminole Nation gaming entity and all portions of the premises where gaming is conducted or where gambling devices or equipment are manufactured, sold or distributed.
 - 1. Information to which the SNGA shall have access to for purposes of inspection includes, but is not limited to the following:
 - a. Papers;
 - b. Documents;
 - c. Books;
 - d. Records of applicants;
 - e. Records of licensees;
 - f. Records of any gaming business;
 - g. Verification of income; and/or
 - h. All matters affecting the enforcement of all state, Tribal or Federal regulations.
 - 2. The SNGA shall have the authority to perform the following to information produced by any Seminole Nation gaming entity at any time of the day or night:
 - a. Inspect;
 - b. Examine;

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- c. Photocopy;
 - d. Remove; and/or
 - e. Impound information.
- C. The SNGA shall have the authority to inspect and examine, without notice, all portions of the premises where gaming is conducted including, but not limited to the following:
 - 1. Areas where gambling equipment or devices are located, manufactured, sold, or distributed;
 - 2. Any gaming devices or equipment; and/or
 - 3. The conduct of any gaming activity.
- D. Access to Criminal Justice Information (CJI) and Criminal History Record Information (CHRI) shall be strictly limited to the Gaming Commissioners, Chief Gaming Regulator, and the Licensing Agents of the Commission who have been authorized to view the CHRI reports by the NIGC.

Section 103. Information Security

- A. Only SNGA Licensing personnel are authorized to access the live scan device and the CJI/CHRI in the performance of their job duties and will utilize their domain credentials when logging into the computer. Each Licensing personnel shall have a unique user ID and a confidential password. No user may access the computer while another user is logged in to it. Once computer access is no longer needed, the Licensing personnel must immediately log off.
- B. The Local Agency Security Officer (LASO) shall act as a liaison with the NIGC and is responsible for coordinating tribal compliance with all federal and state laws and regulation pertaining to the access, use, handling, dissemination, and destruction of CJI and CHRI.
- C. The LASO shall maintain an Authorized Personnel List (APL) that contains all SNGA personnel who are authorized to receive, view, handle, disseminate, store, retrieve, or dispose of CJI/CHRI. The LASO will update the APL with the NIGC when changes occur.
- D. To prevent tampering, all terminated personnel, the public, all outside persons and entities are prohibited from handling or having any access to CJI/CHRI for any reason. Secondary dissemination to an outside agency is strictly prohibited.
- E. SNGA personnel shall only be authorized to access the live scan device after completing Level 3 CJIS Security Training and the one-time signing of an

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- acknowledgement statement. SNGA personnel who have IT responsibilities must complete LASO and Level 4 CJIS Security Training.
- F. LASO training shall be completed once each year for SNGA personnel required to obtain it and CJIS Security Training shall be completed once every two years.
 - G. All authorized personnel shall review the SNGA's internal CJI/CHRI Policies and Procedures. The LASO shall document the internal training and keep the record on file.
 - H. All authorized personnel shall sign the acknowledgement statement forms that outline the training received and the penalties for misuse of CJI/CHRI.
 - I. Access to CJI/CHRI is under the authority of IGRA and through the NIGC for the purpose and use for licensing and/or employment of Key Employees and Primary Management Officials of SNGE as defined by NIGC regulations. No other use of CJI/CHRI shall be authorized. The SNGA LASO shall perform regular audits to ensure each fingerprint submission is for the specific purpose of Key Employee and PMO license suitability and is made pursuant to the authority to access CHRI.
 - J. The CHRI received from the submission of fingerprints for Key and PMO licensees shall be immediately printed out and kept in a hard copy form and secured in the desk of the Licensing personnel. No CJI/CHRI shall ever be left unattended while it is not physically secure.
 - K. CJI/CHRI may not be provided to any other tribe, state, agency, or individual other than the license applicant.
 - L. CJI/CHRI information may not be shared with or discussed with any unauthorized individual. Disclosure of information to an unauthorized individual will result in disciplinary action up to and including termination.
 - M. When an authorized SNGA personnel member is reviewing a hard copy of CHRI, they shall take the necessary measures to ensure that no unauthorized individuals can view the document and must take steps to protect the document from unauthorized view if they leave their office for any reason.
 - N. The SNGA will provide applicants with an appeals process. The appeals process can take place when the applicant challenges his/her suitability determination made by those on the authorized personnel list. This process concludes with the SNGA Gaming Commissioners making the final suitability determination.
 - O. The SNGA LASO is the point of contact with the NIGC through which all communication with the NIGC regarding audits, Tribe/personnel information changes, and training and security are conducted. The LASO will maintain all authorized personnel training on the NJCA Training Documentation Form (or similar document). This information will be available at the time of audit. The LASO can receive and disseminate communication updates from the NIGC.

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- P. Violations of this policy include but are not limited to: accessing data to which the individual has no legitimate right; enabling unauthorized individuals to access data; disclosing data in a way that violates applicable policy, procedures, or relevant regulations or law; inappropriately modifying or destroying data; inadequately protecting restricted data. Any violation of this policy may result in network removal, access revocation, corrective or disciplinary action, civil or criminal prosecution, and termination of employment.
- Q. When an information security incident occurs such as an unauthorized system intrusion, each incident must be tracked and documents, including user response activities. A Security Incident Report form must be completed and submitted to the NIGC ISO within 24 hours of discovery of the incident. The submitted report must contain a detailed account of the incident, events leading to the incident, and steps taken/to be taken in response to the incident.

Section 104. Licensing Application Fees – Refunds

- A. Licensing Fees associated with the following license applications are non-refundable:
 - 1. Employee;
 - 2. Vendor;
 - 3. Facility

Section 105. No Badge No Work Policy

- A. The SNGA implements the following No Badge No Work Guidelines:
 - 1. No employee or vendor may work on the casino floor or be on duty without their Gaming Agency license.
 - 2. Gaming licenses shall always be visibly worn and prominently displayed while on duty.
 - 3. Employees and vendors shall not report to work without being licensed and possessing a valid Employee Gaming/Vendor license.
 - a. Waivers may be requested by a vendor to have a technician being able to use a visitor pass after the Licensing Department has conducted a due diligence check on the technician in emergency situations where there are no other licensed technicians for the vendor that can perform the task that needs to be completed.
- B. Supervisors are responsible for making sure their employees are not on duty with an expired gaming license.

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- C. In the event an employee with an expired/suspended gaming license is allowed to be on duty, the following will take place:
 - 1. The employee shall be escorted off the Seminole Nation Gaming Property by either Casino Security or the Seminole Nation Lighthouse.
- D. If one of the above guidelines is found to be in violation, the Chief Gaming Regulator (CGR) shall levy a fine/penalty in accordance with section 105(a)(14) of Title 15.

Section 106. Communication

- A. The SNGA Licensing Department shall comply with the following guidelines when it comes to communicating with existing employees and new applicants.
- B. For existing employees, the SNGA Licensing Department shall perform their duties in compliance with the following standards:
 - 1. Communicate all matters through the casino Human Resources Department via e-mail or written letter.
 - 2. Ensure all communication with the casino Human Resources Department is documented and maintained in an easily accessible manner.
 - 3. When requesting an employee to contact the SNGA Licensing Department, the deadline for the employee to contact the SNGA Licensing Department shall be by the end of their shift, or next regularly scheduled shift.
 - 4. Failure of an employee to provide the SNGA Licensing Department with requested information after three failed attempts will be subject to having their licensing process terminated and their license will be denied and reported to NIGC as a denial.
- C. For new applicants, communication shall go directly from the SNGA Licensing Department to the applicant, until the applicant's start date.
- D. For vendors, all communications and notices from the SNGA Licensing Department to the Vendor shall be sent via email to the licensing contact with the vendor.

Section 107. Personal Relationships

- A. The SNGA Licensing Department shall comply with the following guidelines for personal relationships.
- B. A relative is defined as a: spouse, child, parent or sibling.

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- C. Applicant's shall not be granted a Key Employee or Primary Management Official License for a position that would place the applicant in any of the following situations:
 - 1. Where the applicant and/or employee may, at any time, supervise or be supervised by another relative.
 - 2. Where the applicant and/or employee would engage in transactions involving direct handling of money or any other method of currency exchange such as gaming chips with a relative.
- D. Applicants and Employee's must notify the Gaming Agency within seven (7) calendar days if any such relationship exists or develops that violates this policy.
- E. Relationships to relatives involving managers and directors shall require authorization from the SNGA Chief Gaming Regulator for approval.

Section 108. Audit of Licensing Files Procedures

- A. The Licensing Manager will audit the files that the Licensing Investigator(s) complete before submitting the files for approval from the Chief Gaming Regulator. Reviewing the files will ensure that the files are accurate and will meet the demands of auditing 5% of the licensing files each year.
- B. The Licensing Department shall ensure that files from the following areas shall be selected for testing:
 - 1. Key Employees;
 - 2. Licensed Vendors;
 - 3. Registered Vendors;
 - 4. Facilities.
- C. Each month, this information will be reported as being done on the monthly report that is submitted for the Commissioners' meeting.

Section 109. Procedures for Processing New Key Employee and PMO

- A. Upon receiving the Employment Verification Form packet from the SNGA or SNGE Human Resources Department(s), these steps will be followed:
 - 1. Begin the preliminary background process which includes running the checks through Clear, ODCR, and Oklahoma Sex Offender Registry. These checks will be conducted before the applicant(s) will be contacted to be scheduled for the licensing application appointment.

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2. Contact the applicant to schedule the appointment to come in and be processed for the gaming license after the preliminary background screening has been completed. The days for these appointments will be Monday, Tuesday and Wednesday.
 - a) Each applicant is informed of the information that is required to be brought in for their appointment to be processed to meet the requirements of the NIGC and the State Compact.
 - b) Each applicant is informed if they are more than ten (10) minutes late, they will be rescheduled.
 - c) Each applicant is informed if they fail to show up for their scheduled appointment and they do not contact the Licensing Department, they will be ineligible for a license and can reapply in sixty (60) calendar days.
 - d) Each applicant shall receive a copy of the “Privacy Act Statement” outlining what the fingerprint record checks are utilized for.
 - e) Each applicant will receive a copy of the “Non-Criminal Justice Applicant’s Rights” that outlines as applicant’s rights as it pertains to their CHRI reports.
3. Once the FBI background results have been received, the Licensing Department will inform the Human Resources Department by email that the applicant is cleared for orientation.
 - a) The only exception is if an employee has their fingerprints rejected twice then a name search has to be conducted by the NIGC. On the name search, it does take longer for this process to be done and the applicant will only be cleared to begin work without the FBI background results if the other preliminary background screenings are clear.
4. Once the applicants have been issued their gaming license, an email is sent out to pertinent departments to inform them of the applicant’s name, position and start date.
5. A temporary license is issued for Ninety (90) calendar days while the Licensing Investigator finishes processing the applicant to meet the sixty (60) day deadline to submit an applicant to NIGC.
 - a) If an applicant’s file cannot be completed to meet the requirements for the licensing process by forty-five (45) calendar days and continued attempts have been made during this time to reach out to the applicant to gather the necessary information, the licensing process will be terminated, and the applicant will not be eligible for a license.
 - b) Upon when the Licensing Investigator has finished an applicant file and typed the investigative report and Notice of Results (NOR), the Licensing Manager

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will review the file prior to submitting to the Chief Gaming Regulator for approval.

6. On a weekly basis, the Licensing Investigator will submit to the Licensing Manager a detailed report that will include pending files, completed files, separations, title/location changes, renewals processed, and new hires received for the week. For all vendor files that are in progress, a report will be created and submitted to the Licensing Manager. These reports will be due every Friday before the end of the business day. After the report is reviewed by the Licensing Manager, this information will be used for the Weekly Managers Meeting report.
 - a) The weekly report from the Licensing Investigator updating the files being processed and being reviewed by the Licensing Manager will help ensure that the deadlines for the processing of new applicants will stay in compliance with the SN TICS, NIGC MICS, and State Compact standards.

Section 110. Grounds for Immediate Denial of a License

- A. Certain standards must be met by the applicant during the preliminary background screening before being contacted to proceed to be scheduled for an appointment to be processed for a license with the SNGA. Listed below are the criteria that would result in an applicant not being processed for a license.
 1. Felony charges within the last ten years that are of a violent crime, embezzlement charge, or theft charge in the amount of over \$1,000 dollars.
 2. If the applicant has any outstanding warrants during the initial licensing process.
 3. If the applicant has had a gaming license revocation within the last twelve (12) months.

Section 111. Conditional Gaming License Approval Procedures

- A. At the Chief Gaming Regulator's discretion, a Conditional License may be issued on a case-by-case basis and may be placed during the time of an applicant's initial licensing process or while a licensee holds a valid gaming license.
- B. A Conditional License may be issued for any outstanding court fees that are in excess of \$400.00 owed during the time of the preliminary background screening.
- C. The Licensing Manager shall create a Conditional License Agreement for any Conditional License that is issued. The agreement shall contain the following information:
 1. The specific terms of the condition;
 2. The length of period the conditional license is granted for (not to exceed 12 months);

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3. The Chief Gaming Regulator shall review the terms of the condition once the applicant's background is completed and prior to the applicant and Licensing Manager's signature;
 4. Date Conditional License is agreed upon;
 5. Signature of Applicant;
 6. Signature of Licensing Manager; and
 7. Signature of the Chief Gaming Regulator.
- D. The Licensee must provide to the Licensing Department proof that all conditions have been met by the established deadline.
- E. Once all terms have been satisfied, the Chief Gaming Regulator shall lift the Conditional License status.

Section 112. Procedures for Processing Renewal Key Applicants and PMOs

- A. Upon initial contact by the Licensing Department for an appointment to renew a gaming license, these steps will be followed:
1. An appointment will be set at a date and time agreed upon by the Licensing Department and Licensee. At this appointment, the Licensee shall sign an updated Agreement to Reappear for Permanent License form to renew their Gaming License before the expiration date.
 - a) Once the applicant has a scheduled appointment, the applicant will come to the SNGA office and complete the renewal application to update their information.
 - b) Backgrounds will be conducted through Clear, On Demand Court Records (ODCR), and the Oklahoma Sex Offender Registry.
 - c) A renewal report will be written by the Licensing Investigator conducting the renewal and then submitted to the Chief Gaming Regulator for approval.

Section 113. Procedures for Random Backgrounds Conducted

- A. Each month, the Licensing Department will conduct random background checks on employees who hold a Key Employee/PMO gaming license with the Seminole Nation Gaming Agency.
1. A check will be conducted through the ODCR to determine if the applicants have failed to disclose any arrest or charges filed against the applicant or if the applicant has any Outstanding Warrants.
 2. If it is determined the applicant has failed to report any arrest or charges filed against them, their license will be suspended. Each applicant signs a form upon initial licensing processing, and upon the renewal process, report this information to the Licensing Department.

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Section 114. Procedures for New Applicant and Renewal Licensing Statement

- A. Once contact has been made with the applicant and the applicant has been placed on the calendar to come in to be processed, the applicant will be listed on the monthly statement to be charged for the licensing fee.
 - 1. If the applicant does not show up for the appointment, the fees will still be assessed as at this point the Licensing Department has already conducted the preliminary background screening.
 - 2. This statement will be completed by the Licensing Manager and after reviewing the calendar for the month and reviewing with the Licensing Investigator's calendar, this statement will be sent to the SNGA Administration Department by the first business day of the next month for billing of the applicants processed for the previous month.

Section 115. Suspension of a Gaming License

- A. Suspension of a License

A gaming license may be suspended after a determination by the SNGA Chief Gaming Regulator that the holder of a license is unsuitable to continue to hold a license based on information provided by the SNGA Licensing Department. Upon review of the information provided, the SNGA Chief Gaming Regulator may start the process of revocation of the license.
- B. Notice of Suspension

The SNGA Licensing Department will notify the applicant of the suspension of their gaming license by notifying the SNGE Human Resources Department and the appropriate manager that the applicant reports to. The licensee in question will receive the full information as to why their license is being suspended and what steps will be required of the applicant to meet the requirements of the SNGA to have the suspension of their license lifted.
- C. Cease Gaming or Work Activities while a license is suspended

A holder of a license who has had their license suspended shall immediately cease all gaming related activities on Tribal land upon receiving notice of the suspension of their license and shall not be allowed to work in the gaming facility or be on any of the gaming premises. All suspended licenses must immediately be surrendered to an SNGA Authorized Personnel at the time of the suspension and then delivered to the SNGA Licensing Department to hold until the suspension is lifted. The continued use of a suspended license by the holder of the license shall be grounds for immediate revocation of the license.
- D. Status of a Suspended Licensing Pending Determination

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A suspended license shall be considered a valid license but is not usable or acceptable for employee or vendor purposes and shall be kept in the licensee's employee's file by the SNGA Licensing Department during the suspension period. This period begins from the date of the suspension notice and runs through the date of the final determination by the SNGA Chief Gaming Regulator, unless otherwise stated by the SNGA Chief Gaming Regulator.

Section 116. License Reinstatement for a Suspended License

A. Good Cause Shown

The holder of the suspended license must show good cause to the SNGA Licensing Department and Chief Gaming Regulator before the reinstatement of a suspended license may be lifted.

B. Once the suspension of the license is lifted, the license will be returned to the person the license has been issued to.

Section 117. Revocation of a License

A. License Revocation.

A license may be revoked after the determination of the SNGA Chief Gaming Regulator finds the licensee is unsuitable to hold a license based on information provided by the SNGA Licensing Department or any other reliable source including, but not limited to, the NIGC. If the SNGA Chief Gaming Regulator determines that an immediate need of the revocation of a license is necessary based on the facts and evidence presented, the Chief Gaming Regulator may immediately revoke the license and is not required to suspend the license prior to taking any revocation action.

B. Notice of Revocation

The SNGA Licensing Department will complete the revocation letter which shall include the reason for revocation and the licensee's appeal rights. Once the Chief Gaming Regulator signs the letter, the licensee and pertinent SNGE personnel will be immediately notified via in person, electronically, or by certified mail with the specific reasons for the revocation. The notice shall also state that the licensee may request a hearing with the SNGA Commissioners regarding the matter of the license revocation within ten (10) days after receipt of the revocation notice.

C. Cease Gaming or Work Activities, Surrender of License

A license becomes invalid immediately upon the notice of revocation. A licensee whose license is revoked shall immediately cease all gaming related activities on Tribal land upon receiving notice of the revocation. Gaming employees shall immediately cease work activities upon receiving notice of the revocation of their license. All licenses must immediately surrender their license to the SNGA Licensing

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Department or Authorized Representative of the SNGA at the time of receipt of the revocation notice.

- D. Appeal Process for adverse action taken against individual or vendor license. After the hearing process, the decision by the Seminole Nation Gaming Commission will be final and no further review will be conducted unless otherwise stated in the recommendations at the hearing.
- E. Hearing Request; Failure to Request a Hearing
If the licensee requests a hearing in a timely manner, all such hearings shall be held in accordance with Section 203(e) of Title 15. If the licensee does not respond or request a hearing with the Seminole Nation Gaming Commission within the specified time period, the decision to revoke the license shall stand.
- F. Revocation Period
The Seminole Nation Gaming Commission shall determine if a license revocation shall be permanent. If the Commission determine that the revocation is to be permanent, the individual is prohibited from ever reapplying for a license with the Seminole Nation Gaming Agency. If the Commission does not determine that the revocation shall be permanent or does not specify that the revocation is permanent, the individual is eligible to reapply for a license after one (1) year from the date of such revocation.

Section 118. Revoked License, Issuance of a New License upon Reapplication

- A. The Seminole Nation Gaming Commission, in their sole discretion, may consider issuing a new license to a former licensee whose license had been revoked when:
 - 1. The license revocation was not deemed to be permanent. The SNGA Licensing Department shall not accept an application for, or issue a new license, when the former license revocation was determined to be permanent;
 - 2. The one (1) year period has expired since the date of revocation;
 - 3. The former licensee has applied for and been selected for employment for a position that will require the applicant to hold a gaming license;
 - 4. The former licensee has completed a licensing application and paid any applicable fees;
 - 5. The application, an initial background investigation and the background investigation did not reveal any information that would disqualify the applicant or result in an unfavorable suitability determination;
 - 6. The former license demonstrated good cause for the SNGA Commissioners or Chief Gaming Regulator to grant the issuance of a new license.

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Section 119. Documentation from Human Resources Department(s)

- A. Documentation regarding the status of an applicant that holds a valid license with the SNGA must be submitted to SNGA Licensing Department within twenty-four (24) hours during business days.
- B. If an applicant is suspended or terminated on a weekend shift, then the paperwork must be submitted to the Licensing Department on the next scheduled business workday.
- C. If an applicant informs management that they are giving their two weeks' notice, the Licensing Department must be notified within twenty-four (24) hours of the resignation to be able to inform the pertinent departments of the applicant resigning.
- D. If an applicant is going to be off work for an extended amount of time, the Licensing Department must be notified within twenty-four (24) hours to inform the pertinent departments.

Section 120. Licensee Responsibility to Update and Correct Information

- A. It shall be the responsibility of the licensee to update or correct their necessary information within five (5) business days for licensing during the term of their license to ensure that the SNGA Licensing department files are current and correct.
- B. The Licensee shall also notify the Licensing Department within five (5) business days of any arrests, charges, or citations and provide the following information:
 - a. Arrest date or date received citation for violation(s)
 - b. Court date appearance
 - c. Documentation for court ordered directions (fine amount/payment schedule/DUI or drug court assessments/community service/classes, etc.)
 - d. Receipts for fine payments
- C. Failure to abide by these reporting requirements will result in a Gaming License suspension as outlined in Section 115 of this policy.

Section 121. Criminal Convictions as Grounds for License Suspension, Revocation, Denial, or Conditions

- A. The SNGA Chief Gaming Regulator may suspend, revoke, deny, or place conditions on the gaming license of a licensee who is convicted of a crime occurring while the licensee holds a valid license with the SNGA, even though the convicted person's rights and remedies have not been exhausted.

Section 122. Confidentiality and Handling of Licensing Information

- A. Information Received and Maintained on Individuals

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Any information about an individual that is received and maintained by the SNGA Licensing Department, including education, financial transactions, criminal or employment history, or other information used for the licensing process that contains any identifying information about the individual, shall be considered private and confidential and shall be used for the sole purpose of determining the suitability of the individual to be licensed or maintain their license with the SNGA.

B. Information Received and Maintained on Vendors and Others

The information requested or required by the SNGA Licensing Department may contain commercial or financial information of a confidential, proprietary or privileged nature. All information submitted by a person, corporation, entity seeking a vendor license or registration by the SNGA Licensing Department during a background investigation shall be used for the sole purpose of determining the suitability of the entities that want to hold a license with the SNGA to conduct business with the Seminole Nation Gaming Enterprise.

C. Handling Confidential Information

The information received and maintained by the SNGA Licensing Department shall be handled and used only by the NIGC, State Compliance Auditors, SNGA Chief Gaming Regulator, and SNGA Commissioners for licensing purposes. Certain information, such as CHRI and other criminal history information shall be strictly restricted to only the SNGA Commissioners, Chief Gaming Regulator, and Licensing Department that are directly involved in the licensing process. Once the background investigation is completed the licensee's information will be placed in a locked file cabinet that the SNGA Licensing Department are the only staff that have keys to access these files.

D. Disclosure to Outside Agencies

Information may be disclosed to appropriate Federal, State, Tribal, Local or Foreign law enforcement and regulatory agencies when relevant to civil, criminal, or regulatory investigations or prosecutions, or when pursuant to a requirement by a Tribe or the NIGC in connection with the hiring or firing of an employee, the issuance or revocations of a gaming license, or investigations of activities while associated with a tribe or gaming operation, or when required by law. At no time will a copy of a licensee's file will be given to the operations management or other Tribal entities that are not on a need to know bases.

E. Access by the Individual

An individual about whom the Seminole Nation Gaming Agency has received and maintained information may request in writing to review his or her file. The SNGA Licensing Department will provide information to the individual on how to obtain their full Criminal History Record Information (CHRI) from the FBI. The SNGA Licensing Department cannot disclose the identity of informants and individuals contacted during the course of the investigation. The individual may only review this information in the

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presence of the SNGA Licensing Department personnel and may not remove said information documents off SNGA premises.

Section 123. Vendor Licensing

- A. Processing a new gaming vendor, gaming-related vendor or non-gaming vendor.
 - 1. Upon contact with the vendor and confirmation from the SNGA or SNGE to verify a business relationship is going to be pursued, an application will be issued for the company, principals, and vendor employees who will need to be licensed.
 - 2. A deadline of thirty (30) calendar days will be set for the vendor to complete all applications and required forms and submit this information to the Licensing Department.
 - 3. Failure to meet the deadline that is set will result in an automatic denial of the application and the vendor will be eligible to reapply in ninety (90) calendar days.
 - 4. Upon receipt of the applications and required documentation, an invoice request will be submitted to the SNGA Administration Department to issue an invoice for the licensing fees.
 - 5. After processing the vendor company, principals and vendor employees for a license, an investigative report will be completed and then submitted to the Chief Gaming Regulator for final approval.
- B. Vendor Renewal License
 - 1. Vendor renewal license will be issued one hundred twenty (120) calendar days out from the expiration date to ensure time for the vendor to be processed for the renewal license in a timely manner.
 - 2. Vendors will be processed to the same standards regarding deadlines as the new vendors.
- C. Vendor Registration
 - 1. The registration application will be issued for the proposed vendor. A deadline of thirty (30) calendar days will be set for the application and any required forms to be submitted to the Licensing Department.
 - 2. Failure to meet this deadline will result in the application being denied and the vendor will be eligible to reapply in ninety (90) calendar days.
- D. Vendor Licenses for On-Site Employees
 - 1. After approval of the license or registration, each vendor employee who has applied must schedule an appointment with the Licensing Department to come in and pick up their valid Vendor license.
 - 2. Vendor employees who are licensed or registered with SNGA must have their valid Vendor license on before performing any work at any of SNGE casino properties.
 - 3. A visitor badge will only be acceptable to use by a vendor after approval of the Licensing Department has reviewed the reason a license has not been issued.

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E. Vendor Licenses and Registration

1. All vendor licenses will be valid for one (1) year from the date of expiration assigned by the Licensing Department.
2. All vendor principal and technician licenses will be valid for two (2) years from the expiration date assigned by the Licensing Department.

Section 124. Maintenance of Files and Records

A. Retention Period

The SNGA Licensing Department shall retain all records pertaining to all licensing applications, background investigations, and related matters for at least three (3) years from the separation date of employment.

B. Destruction of Documents

All SNGA licensing files and records pertaining to licensing applications, background investigations, and related matters shall be discarded only in a manner that results in the destruction of the file and obliteration of the information in the file by the SNGA Licensing Department via an electronic shredding device that shall only be utilized by the SNGA Licensing Department. The SNGA Licensing Department shall update the licensing access database and checkmark the section for shredding and put the date it was shredded. Only the Licensing Department has access to the Licensing Applicants database.

Section 125. Licensing Fee Schedules

A. New Applicant-

1. PMO – \$150
2. Key – \$125
3. Non-Key – \$85
4. Gaming Principal/Technician – \$500
5. Gaming Related Principal/Technician – \$400
6. Non-Gaming Principal/Technician – \$150

B. Renewal Applicant

1. PMO – \$125
2. Key – \$100
3. Non-Key – \$65
4. Gaming Principal/Technician – \$500
5. Gaming Related Principal/Technician – \$400
6. Non-Gaming Principal/Technician – \$150
7. Replacement license – \$20

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Section 126. Vendor Licensing Fee Schedule

- A. New Gaming Vendor Company – \$5,000
- B. Renewal Gaming Vendor Company Fees:
 - 1. No machines – \$ \$1,250
 - 2. 1 - 50 machines – \$ \$1,750
 - 3. 51 - 100 machines – \$ \$2,750
 - 4. 101 - 150 machines – \$ \$4,250
 - 5. 151 machines and above– \$ \$5,250
- C. Gaming Related Vendor Fees
 - 1. \$1 - \$24,999 – \$500
 - 2. \$25,000 - \$50,000 – \$ \$1,750
 - 3. \$50,001 - \$100,000 –\$2,250
 - 4. \$100,001 and above– \$ \$2,750
- D. Non-Gaming Vendor Fees
 - 1. \$1 - \$24,999 – \$250
 - 2. \$25,000 - \$50,000 – \$300
 - 3. \$50,001 - \$100,000 – \$500
 - 4. \$100,001 and above – \$1,000
- E. Facility License Fees
 - 1. Tier C Facility – \$60,000
 - 2. Tier B Facility – \$40,000
 - 3. Tier A facility – \$20,000

Section 127. Facility License

- A. The SNGA shall issue a separate license to each place, facility, or location on Indian lands where Class II and/or Class III gaming is conducted under the Seminole Nation Gaming Ordinance a minimum of once every three (3) years.
- B. The SNGA shall specify the form, conditions, and content for the application for such licenses which shall be submitted by the Seminole Nation Gaming Enterprise.
- C. The initial application shall include, at a minimum, the following:
 - 1. A legal description of the lands where on the facility is located, and a certification that said premises constitute “Indian lands” as specified in the Indian Gaming Regulatory Act; and
 - 2. A provision identifying the environmental, health, and public safety standards with which the facility shall comply, and a certification that the facility is in compliance therewith.

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- D. Each subsequent application for the renewal of such facility license shall identify any changes or additions to said legal description and applicable environmental, health, and safety standards, and shall include current certifications of compliance therewith.
- E. The SNGA shall only issue such licenses if the applications therefore include the required information and certifications and such further conditions as the SNGA has specified.