The purpose of the Gaming Commission is regulatory, not managerial, and therefore, the Commission shall not interfere with the management of the Nation's Gaming operations except for citing violations of applicable Gaming laws and regulations to ensure compliance therewith. The Commission and Comanche Nation Entertainment (CNE) will work together to resolve regulatory issues. The Commission's duties and responsibilities are limited and specific to ensure the fair and impartial consideration of all matters related to licensing and enforcement of compliance with Gaming laws and regulations.

**Job Duties and Responsibilities:** To perform this job successfully, an individual must be able to perform each essential duty satisfactorily. The requirements listed below are representative of the knowledge, skill, and/or ability required:

- Comply and ensure compliance with the Comanche Nation Gaming Ordinance, Indian Gaming Regulatory Act, the Tribal State Compact, and any other applicable Gaming laws and regulations, including but not limited to any and all reporting requirements.
- Promulgate the following tribal internal control standards, regulations, and procedures, all of which must be approved by the CBC, to implement the provisions of the Ordinance, to comply with other applicable Gaming laws and regulations, to track and audit the generation and expenditure of Gaming revenue, and to promote effective regulation of Gaming.
  - Regulations for the licensure, including tiered licensure, or registration of vendors, employees, and Gaming Facilities as required in Part 400 of the Ordinance.
  - Regulations and procedures governing the conduct of background investigations that set forth eligibility standards for the different tiers of licensing and the registration of vendors, employees, and Gaming Facilities.
  - Regulations providing for the levying of fees, including a schedule of such fees, associated with registering, permitting, and licensing, as applicable, of employees, vendors, and Gaming Facilities, and the certification, as applicable, of Gaming devices.
  - Regulations governing enforcement actions, the levying of fines, including a schedule of such fines, and the denial, suspension, or revocation of any individual or vendor license, for violations of the Ordinance or any other applicable Gaming laws and regulations.
    - Fines may be assessed against employees of CNE or employees of the Gaming Commission pursuant to the authority provided in the Indian Civil Rights Act of 1968 (as amended).
  - A list of regulatory authorities that conduct background investigations of, and license vendors.
  - Procedures and standards for the internal audit of all Gaming areas of the Nation's Gaming Facilities in accordance with the internal audit requirements set forth in 25 C.F.R. Parts 542 and 543.
  - Regulations governing nepotism and for segregation of duties among incompatible positions for immediate family members.

- Regulations to allow for the voluntary and involuntary exclusion of certain persons from the Nation's Gaming Facilities.
- o Procedures and regulations to provide any affected person or entity the right to due process and the right to appeal any adverse action taken by the Commission.
- Regulations governing hearings, the issuance of subpoenas, receipt of evidence, and adjudication of appeals.
- Certify gaming devices in accordance with established procedures and as required by the Compact and 25 C.F.R. Parts 543 and 547.
- Holding hearings, issue subpoenas, receive evidence, and adjudicate appeals, all in accordance with CBC-approved regulations, on matters related to licensing and enforcement actions taken by the Commission.
- Adjudicate Patron tort claims and prize claims in accordance with applicable laws and CBC-approved regulations.
- Ensure that the CNE annual audit under Section 222 of the Ordinance is secured.
- Approve and enter into contracts and other agreements Commissioner subject to the limitations set forth at Section 316 of the Ordinance.
- Establish, adopt, and cause to be implemented policies and procedures, including personnel policies, that are applicable to the Gaming Commission and its employees.
- Management of the budget of the Gaming Commission.
- Monitor and oversee the regulation and enforcement of the Nation's Gaming by the Executive Director and Commission staff.
- Enforcement of the Ordinance and CBC-approved regulations, including but not limited to:
  - Conduct appropriate background investigations of Primary Management Officials, Key Employees, and other persons required to be licensed or permitted.
  - o Reports results of background investigations, as required, to the NIGC.
  - Obtain and process fingerprints.
  - o Make licensing eligibility determinations and issue tiered Gaming licenses for Gaming Employees, Gaming Vendors, and others whose licensure is required.
  - o Make permitting eligibility determinations and issue permits for Non-Gaming Employees, Non-Gaming Vendors, and others requiring a permit.
  - May issue Gaming Vendor licenses by reciprocity to applicants that are currently licensed by trustworthy regulatory authorities.
  - Issue permits, registration, and waivers to employees or vendors, if they meet requirements.
  - Issue Gaming Facility licenses.
  - Assess and collect fees related to the processing of applications for permits, registration, and licensure, as applicable, of employees of CNE, employees of the Gaming Commission, and vendors.
  - Assess fines, as applicable, related to enforcement actions for violations of the Ordinance or any other applicable Gaming laws and regulations;
  - In order to carry out the Commission's regulatory duties, authorized staff of the Commission shall have unrestricted access to all areas and records of CNE, and may inspect, examine, and monitor all Gaming Activities and have immediate access to review, inspect, examine, photocopy and audit all records of the Gaming

- Facility; provide however, ever reasonable effort shall be made to avoid unnecessary disruptions to the Nations' Gaming Activities.
- Perform the internal audit of all major Gaming areas of the Nation's Gaming Facilities.
- o Investigate any suspicion of wrongdoing associated with any Gaming Activity.
- Establish a list of persons not allowed to Game in the Nation's Gaming Facilities or allowed to hold a Gaming license in order to maintain the integrity of the Gaming.
- Establish and maintain a list of persons who have voluntarily asked to be excluded from the Nation's Gaming Facilities.
- o Provide referrals and information to the appropriate law enforcement officials when such information indicates a violation of Tribal, Federal, or State statutes.
- Review, solely for compliance with the Ordinance and other applicable Gaming laws and regulations, the following items and activities of CNE if such item or activity is directly related to Gaming or a Gaming Activity:
  - Contracts.
  - Policies and Procedures.
  - Promotions planned by Gaming Facilities.
  - Implementation, maintenance, and removal of software systems, servers, and slot management systems.
  - Installations, maintenance, and removal of gaming devices.
    - The foregoing shall not be revised by the Commissioner and shall only be approved or denied.
    - If denied, documentation shall be provided to CNE that sets forth the section(s) and language of the submitted item or process that is (are) non-compliant and the applicable sections(s) of law(s) or regulation(s) with which the item or process does not comply.
- Delegate duties, as needed, to the Executive Director and Commission staff.
- Any other duties or powers not prohibited herein that the CBC determines are necessary to monitor and oversee the regulation of the Nation's Gaming.

## **Qualifications and Requirements:**

- Be an enrolled member of the Comanche Nation.
- Demonstrate honest, integrity, and good moral character.
- Possess a high school diploma; four (4) or more years' work experience in a highly regulated industry in the field of business management, compliance, or regulation; and at least of the following:
  - o Demonstrated knowledge of licensing requirements for Gaming Facilities.
  - o Demonstrated knowledge of compliance requirements for Gaming Facilities.
  - Demonstrated knowledge of audit requirements for Gaming Facilities; or
- Possess a Bachelor's degree in Business Administration, Management, Accounting, Marketing, Law, or another relevant field, with a preference given to candidates with a relevant graduate degree; two (2) or more years' work experience in a highly-regulated

industry in the field of business management, compliance or regulation; and at least one of the following:

- o Demonstrated knowledge of licensing requirements for Gaming Facilities.
- o Demonstrated knowledge of compliance requirements for Gaming Facilities.
- o Demonstrated knowledge of audit requirements for Gaming Facilities.

**Reasoning Ability:** Ability to build a working relationship with CNGC management, casino management, employers and other regulatory agencies. Ability to organize and keep accurate records, maintain an accessible filing system, write routine correspondence and speak effectively to the public, employees and customers. Must be able to effectively deal with frequent interruptions and simultaneously work on multiple tasks.

**Working Environment and Conditions:** Performs duties in a well-lighted, ventilated and temperature-controlled office environment.

**Licensing Requirements:** Must be able to obtain and maintain a CNGC Key License.

**Confidentiality:** All CNGC employees must abide by confidentiality policies. The release or divulging of any information obtained during the course of the job will be considered a breach of confidentiality and will be cause for immediate termination.

**Disclaimer and Conditions of Employment:** The above statements are intended to describe the general nature and level of work being performed by people assigned to this job title. They are not intended to be construed as an exhaustive list of all responsibilities, duties and skills required of personnel so classified.

Conditions of employment with the CNGC include passing a pre-employment drug test, a background investigation to secure a gaming license and successfully completing a three-month introductory period. Candidates for this position will be required to have dependable transportation available to them. CNGC is an at-will employer.