

SANTA YSABEL TRIBAL GAMING COMMISSION

SYGC 14-I011

Commission Regulation

Requirements for VPN Aided Class II Gaming Conducted within Boundaries of the Santa Ysabel Tribal Reservation

Pursuant to SYGC Gaming Ordinance Section XI (F) & (G), regulation of gaming activity, the Santa Ysabel Gaming Commission hereby adopts the following regulation:

1.0 Purpose of Regulation

- (a) The Iipay Nation of Santa Ysabel (“Nation”) has adopted the Iipay Nation of Santa Ysabel Gaming Ordinance (“Gaming Ordinance”), and, effective as of April 30, 2010, the Gaming Ordinance has been approved by the Chairman of the National Indian Gaming Commission (“NIGC”) pursuant to the federal Indian Gaming Regulatory Act of 1988 (“IGRA”), P.L. 100-497, 25 U.S.C. §2701, *et seq.*, as it may be amended from time to time, and the regulations of the NIGC promulgated thereunder.
- (b) The Santa Ysabel Gaming Commission (“Gaming Commission”) was established under Section XI, Paragraph A of the Gaming Ordinance to exercise regulatory authority over all gaming activities conducted within the jurisdiction of the Nation and, pursuant to Section XI, Paragraph G, is empowered, subject to Executive Branch and Legislative Branch review and comment, to promulgate regulations to implement the provisions of the Gaming Ordinance, including those necessary to the interpretation and application of the Gaming Ordinance by the Gaming Commission in connection with exercising its regulatory powers.
- (c) In order to describe the regulatory requirements for VPN Aided Class II Gaming conducted within the boundaries of the Santa Ysabel Indian Reservation, the Gaming Commission finds it necessary in connection with exercising its regulatory powers to promulgate a regulation governing the operation of such VPN Aided Class II Gaming.

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2.0 Definitions used in this Regulation

Any capitalized terms used herein not otherwise described in this Regulation shall have the meanings ascribed to them in this Section. Any capitalized terms not otherwise defined in this Regulation shall have the meaning ascribed to them in the Gaming Ordinance.

- (a) “Account” means an electronic ledger operated and maintained by the Gaming Enterprise wherein information relative to VPN Aided Class II Gaming is recorded on behalf of an Account Holder including the following types of transactions:
 - (1) Deposits;
 - (2) Withdrawals;
 - (3) Amounts risked;
 - (4) Amounts paid for prize winnings; and
 - (5) Adjustments to the account.
- (b) “Account Holder” means an individual at least eighteen (18) years of age who has used the VPNAPS to establish an account to become a properly registered account holder with the Gaming Enterprise.
- (c) “Class II Gaming” means those gaming activities defined as “class II gaming” in IGRA, 25 U.S.C. §2703(7).
- (d) “Class II Gaming System” means a “Class II gaming system” as defined in 25 CFR §547.2; including any components that facilitate access to the system or communication between Account Holders, their proxy agents and the Gaming Enterprise.
- (e) “Critical Components” means the hardware, software or other components required to be present and operational in order for the VPNAPS to properly operate.
- (f) “Data Storage Device” means any device that stores information or data from any electronic or optical medium, including, but not limited to, computers, cellular telephones, magnetic tape, electronic computer drives and optical computer drives, and the medium itself.

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- (g) “Encryption” means the protection of data in electronic or optical form, in storage or in transit, using: (1) an encryption technology that has been adopted by an established standards setting body, including, but not limited to, the Federal Information Processing Standards issued by the National Institute of Standards and Technology, which renders such data indecipherable in the absence of associated cryptographic keys necessary to enable decryption of such data; (2) appropriate management and safeguards of cryptographic keys to protect the integrity of the encryption using guidelines promulgated by an established standards setting body, including, but not limited to, the National Institute of Standards and Technology; and (3) any other technology or method identified and adopted by the Gaming Commission.
- (h) “Gaming Enterprise” means the tribal gaming business owned and operated by the Nation, to be commonly known as and d/b/a Santa Ysabel Interactive, which conducts VPN Aided Class II Gaming, is licensed by the Gaming Commission to conduct such Class II Gaming activities and receives the revenues, issues the prizes, and pays the expenses associated with such Class II Gaming activities.
- (i) “Hot Swappable” means VPNAPS components that can be replaced without shutting down the system.
- (j) “Multifunctional Device” means a machine that incorporates the functionality of devices, which may include, without limitation, a printer, copier, scanner, facsimile machine or electronic mail terminal, to provide for the centralized management, distribution or production of documents.
- (k) “Patron Registration Site” means the patron-facing interface of the VPNAPS, which, by virtue of the design of the VPNAPS, individuals must first access when using the VPNAPS.
- (l) “Person” means any individual, partnership, joint venture, corporation, joint stock company, company, firm, association, trust, estate, club, business trust, municipal corporation, society, receiver, assignee, trustee in bankruptcy, political entity and any owner, director, officer or employee of any such entity or any group of individuals acting as a unit, whether mutual, cooperative, fraternal, nonprofit, or otherwise, the government of the Nation,

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any governmental entity of the Nation or any of the above listed forms of business entities that are wholly owned or operated by the Nation; provided, however, that the term does not include the federal government and any agency thereof. The plural of “Person” is “People.”

- (m) “Personally Identifiable Information” means any information about an individual maintained by the Gaming Enterprise including any information that can be used to distinguish or trace an individual’s identity, such as (1) name, social security number, date and place of birth, mother’s maiden name, or biometric records; and (2) any other information that is linked or linkable to an individual, such as medical, educational, financial, and employment information.
- (n) “Nation” means the Iipay Nation of Santa Ysabel, a federally recognized Indian Nation (federally recognized as the Iipay Nation of Santa Ysabel, California – previously listed as the Santa Ysabel Band of Diegueno Mission Indians of the Santa Ysabel Reservation).
- (o) “VPN” means a virtual private network which (a) has been assigned a “special use” Internet protocol address in the range from 10.0.0.0-10.255.255.255, 172.16.0.0-172.31.255.255, and 192.168.0.0-192.168.255.255 by the Internet Assigned Numbers Authority, and (b) uses a form of communication that utilizes secured and restricted access connections (i.e. via software and a server that authenticates users, encrypts data, and manages sessions with users) over connectivity infrastructure to create point-to-point connections segregated and isolated from the publicly accessible Internet network (also known as the World Wide Web), such as to constitute a closed, proprietary communication network.
- (p) “VPN Aided Class II Gaming” means server-based electronic bingo games offered by the Gaming Enterprise to be played on the Nation’s sovereign Indian lands using a Class II Gaming System, known as the VPNAPS, containing several proprietary technologic aids, including a component that facilitates access through a secure virtual private network connection between Account Holders and their proxy agents located on the Nation’s Indian lands which assists proxy play on behalf of the Account Holder.

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- (q) “VPN Aided Class II Gaming Service Provider” means any Class II Gaming vendor who, directly or indirectly, provides, has provided, or is deemed likely to provide at least twenty-five thousand dollars (\$25,000) in Class II Gaming resources to the Gaming Enterprise conducting VPN Aided Class II Gaming in any 12-month period, or who has received at least twenty-five thousand dollars (\$25,000) in any consecutive 12-month period.
- (r) “VPNAPS” means the Class II Gaming System known as the “Virtual Private Network Assisted Play System”, a licensed, proprietary technology platform comprised of multiple software processes and hardware components that work together to offer Class II server-based electronic bingo games via a secure and restricted access VPN connection accessed through any web browser enabled device; including the collective hardware, software, VPN, proprietary hardware and software specifically designed or modified for, and intended for use by the Gaming Enterprise, to conduct VPN Aided Class II Gaming within the boundaries of the Santa Ysabel Indian Reservation on Indian lands.

3.0 VPN Aided Class II Gaming Service Providers

- (a) A VPN Aided Class II Gaming Service Provider who assists the Gaming Enterprise in offering VPN Aided Class II Gaming shall be subject to the provisions of this Regulation applicable to such services to the same extent as the Gaming Enterprise. The Gaming Enterprise continues to have an obligation to ensure, and remains responsible for, compliance with this Regulation regardless of its use of a VPN Aided Class II Gaming Service Provider.
- (b) A Person may act as a VPN Aided Class II Gaming Service Provider only if that Person holds a license specifically permitting the Person to act as a VPN Aided Class II Gaming Service Provider.
- (c) The Gaming Enterprise may only use the services of a VPN Aided Class II Gaming Service Provider that is licensed by the Gaming Commission as a VPN Aided Class II Gaming Service Provider.

4.0 VPNAPS

- (a) The Gaming Enterprise shall not operate the VPNAPS unless the VPNAPS has been approved by an endorsed independent testing

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lab or the Gaming Commission. The VPNAPS shall meet, at a minimum, industry standards verified by an endorsed independent testing lab or such standards that are accepted by the Gaming Commission. All endorsed independent testing lab certifications shall be made available in writing to the Gaming Commission upon request.

- (b) No modification to the Critical Components of the VPNAPS shall be made unless the proposed Critical Component modification has been approved by the Gaming Commission.
- (c) Prior to commencing operations of the VPNAPS, the Gaming Commission shall be provided with a list of all individuals who may access the main computer or data communications components of the VPNAPS and any changes to that list shall be provided to the Gaming Commission within ten (10) days.
- (d) The Gaming Commission may at any time inspect and test the VPNAPS or any component thereof to ensure it operates within the parameters certified by an endorsed independent testing lab or as accepted by the Gaming Commission.
- (e) The Gaming Commission may at any time require the Gaming Enterprise to restrict or limit an individual's access to VPN Aided Class II Gaming via the VPNAPS while the individual is physically located in a particular state or foreign jurisdiction. The Gaming Enterprise, however, may choose to restrict or limit an individual's access to VPN Aided Class II Gaming via the VPNAPS while the individual is physically located in a particular state or foreign jurisdiction whether the Gaming Commission requires it or not.

5.0 Control System

- (a) Internal controls that comply with industry standards or such standards that are accepted by the Gaming Commission shall be established, maintained, and implemented. Compliance with such minimum standards shall be evidenced in writing and submitted to the Gaming Commission for purposes of approval.
- (b) Internal control submissions shall include detailed information of the following:

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- (1) The VPNAPS;
- (2) Procedures and controls for the operation of the VPNAPS, including, but not limited to:
 - i. Registering Account Holders via the VPNAPS;
 - ii. Identifying and verifying Account Holders to prevent those who are not authorized Account Holders from using the VPNAPS. The procedures and controls must incorporate robust and redundant identification methods and measures in order to manage and mitigate the risks of non-face-to-face transactions inherent in VPN Aided Class II Gaming;
 - iii. Handling Account Holder deposits, withdrawals and all other account transactions;
 - iv. Protecting and ensuring confidentiality of Account Holders' accounts;
 - v. Recording credits and debits to Account Holders' accounts; and
 - vi. Identifying and blocking an individual's access to VPN Aided Class II Gaming via the VPNAPS while the individual is physically located in a particular state or foreign jurisdiction, either as required by the Gaming Commission or determined by the Gaming Enterprise.
- (3) Procedures and controls for protecting Account Holders' Personally Identifiable Information, including, but not limited to:
 - i. Determining the nature and scope of all Personally Identifiable Information collected, the locations in which such information is stored, and the devices or media on which such information may be recorded;
 - ii. Protecting Personally Identifiable Information from unauthorized access;

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- iii. Notifying Account Holders of applicable privacy policies;
 - iv. Procedures to be used in the event a data security breach occurs; and
 - v. Procedures for compliance with all tribal, state and federal laws concerning privacy and security of Personally Identifiable Information.
- (4) Accounting systems and procedures that adhere to Generally Accepted Accounting Principles (“GAAP”);
 - (5) Procedures to be followed to assist proxy play of a Class II bingo game on behalf of the Account Holder by the proxy agent;
 - (6) Procedures for aborted or miscarried Class II bingo games played on the Account Holder’s behalf by the proxy agent;
 - (7) Procedures and standards for the maintenance, security and storage of VPNAPS equipment to be used in conjunction with VPN Aided Class II Gaming;
 - (8) Procedures for establishing and maintaining security facilities including general compliance and internal controls to access critical systems;
 - (9) A disaster recovery plan;
 - (10) An adequate system of data backup;
 - (11) Procedures for promoting responsible VPN Aided Class II Gaming, preventing individuals who have self-excluded from engaging in VPN Aided Class II Gaming, and permanently banning players from participating in VPN Aided Class II Gaming;
 - (12) Procedures and controls designed to detect and prevent transactions that may be associated with money laundering, fraud or other criminal activities and to ensure compliance with all federal laws related to money laundering;

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- (13) Procedures outlining the policies and procedures for surveillance;
 - (14) Procedures for calculating and submitting appropriate taxes or fees to the Gaming Commission; and
 - (15) Any other information that the Gaming Commission may require.
- (c) The financial accounting records, quarterly audits and approved control system shall be subject to an annual audit conducted by an independent, licensed, CPA firm.
 - (d) The costs incurred for such an audit shall be borne by the Gaming Enterprise. A copy of the annual audits shall be provided to the Gaming Commission within one hundred twenty (120) days of the end of the Gaming Enterprise's fiscal year.
 - (e) The Gaming Commission shall have the right to direct the Gaming Enterprise to change or modify the approved control system in any manner whatsoever, within a period of time which shall be not less than thirty (30) days from the date on which the directive is served on the Gaming Enterprise.
 - (f) All VPN Aided Class II Gaming shall be conducted only under the control system which has been approved by the Gaming Commission.

6.0 Physical Security of Servers and Equipment

- (a) The Gaming Enterprise shall take all reasonable steps to ensure that the premises on which is kept any servers and equipment used to facilitate the conduct of VPN Aided Class II Gaming are free from access by unauthorized individuals.
 - (1) All areas with servers and equipment used to facilitate the conduct of VPN Aided Class II Gaming and other critical areas shall be secured with sufficient means and meet industry standards or such standards that are accepted by the Gaming Commission for surveillance coverage which include at a minimum:

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- i. Access technology that will adequately determine the identity of and restrict access to authorized individuals;
 - ii. Ability to detect and log any unauthorized access or attempts to gain unauthorized access; and
 - iii. Surveillance technology that will continuously monitor and record the area housing the VPNAPS, including access thereto. Surveillance technology shall monitor and record individuals assigned to oversee and monitor the VPNAPS.
- (2) At any time, the Gaming Enterprise may be required to implement other physical security measures as required by the Gaming Commission.
- (3) A certificate(s) shall be submitted to the Gaming Commission that security measures in subsection 6(a)(1) have been tested by a licensed independent or state governmental security testing entity. Information shall include:
- i. The name of the company or body that carried out the testing;
 - ii. The individuals' names and credentials who performed the testing;
 - iii. The starting and ending dates and times of testing;
 - iv. A declaration that the access controls have been tested and conform to industry standards or such standards that are accepted by the Gaming Commission;
 - v. A declaration that the physical security of the equipment is free and secure from unauthorized individuals and meets industry standards or such standards that are accepted by the Gaming Commission;

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- vi. A list of aspects that have been deemed inadequate; and
 - vii. Any such information that is deemed to be necessary from time to time by the Gaming Commission for whatever reason.
- (4) The certificate(s) described in subsection 6(a)(3) shall be submitted annually, or at an interval deemed appropriate by the Gaming Commission.
 - (5) Access to the VPN Aided Class II Gaming related servers and equipment described in subsection 6(a)(1) shall be restricted to those individuals who are deemed necessary for installing, repairing or maintaining the integrity of the servers and equipment for the purposes of ensuring the servers and equipment are not compromised.
 - (6) The ability to gain access and logon to the servers and equipment used to conduct VPN Aided Class II Gaming shall be restricted to being physically at the servers and equipment; remote accessing of servers and equipment shall be restricted to controls approved by the Gaming Commission.
 - (7) All servers and equipment used to facilitate the conduct of VPN Aided Class II Gaming shall be located on Indian lands within the jurisdiction of the Nation.

7.0 VPNAPS and System Architecture

- (a) Prior to operation, a detailed description of the VPNAPS shall be submitted to an endorsed independent testing lab to certify functionality, security and compliance with industry standards or such standards that are accepted by the Gaming Commission. Such descriptions shall include:
 - (1) Detailed description of equipment architecture, software and hardware;
 - (2) Detailed description of the server(s);
 - (3) Detailed description of communication protocols; and

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- (4) Detailed list of which modules affect (if changed):
 - i. Processes;
 - ii. Parameters;
 - iii. Outcomes;
 - iv. Accounting; and
 - v. Protocols.
- (5) Any other information that is of material importance to the specific hardware or software.
- (b) The VPNAPS shall be designed such that data may be backed up at intervals established by the Gaming Commission, and, if deemed necessary by the Gaming Commission, such backup shall be sent to an additional server located at a different location.
- (c) In the event of a power loss to the VPNAPS, an auxiliary or backup power source shall be available and capable of providing immediate restoration of power, for a minimum of twenty four (24) hours to all Critical Components that enable the VPNAPS to operate. Auxiliary or backup power sources such as UPS systems, a backup generator, or an alternate utility supplier satisfy this requirement.
- (d) The VPNAPS shall be equipped to self-test and will lock up or inform the Gaming Enterprise of problems.
- (e) The VPNAPS shall provide audit functions and store information in an unalterable read-only format for a duration established by the Gaming Commission. Such information shall include:
 - (1) Log in name, dates and times;
 - (2) A log of any changes to permissions, protocols or processes;
 - (3) A log of any changes to critical Components or Hot Swappable components;
 - (4) Additions, removals, upgrades to any software; and

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- (5) Any other information or data deemed necessary by the Gaming Commission.
- (f) The VPNAPS shall employ a mechanism that complies with industry standards or such standards that are acceptable by the Gaming Commission to detect and identify the physical location, by state or foreign jurisdiction, of an individual when attempting to access VPN Aided Class II Gaming via the VPNAPS. If, when attempting to access VPN Aided Class II Gaming via the VPNAPS, an individual is physically located in a state or foreign jurisdiction from which access has been restricted or limited, either as required by the Gaming Commission or determined by the Gaming Enterprise, the VPNAPS shall deny or disable the individual's access to VPN Aided Class II Gaming via the VPNAPS.
- (g) The VPNAPS shall be tested by an endorsed independent testing lab to certify functionality, security and compliance with industry standards or such standards that are accepted by the Gaming Commission. The Gaming Commission may at any time require additional testing to be performed on the VPNAPS or any component thereof.
- (h) No changes to the VPNAPS or any component thereof that may interrupt or affect the function or operating parameters of VPN Aided Class II Gaming may be performed without prior written approval from the Gaming Commission.
- (i) Where approval of the VPNAPS is not granted, the Gaming Commission shall inform the applicant of its decision in writing stating the reasons for refusal.

8.0 Cyber-Attacks

- (a) All appropriate measures that meet industry standards or standards accepted by the Gaming Commission shall be implemented to prevent, detect and suppress cyber-attacks.
- (b) In the event of a cyber-attack of any sort, the Gaming Commission shall be notified immediately, and the VPNAPS shut down if deemed necessary by the Gaming Enterprise or the Gaming Commission to prevent unauthorized access to Account Holders' accounts or

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changes to or money transfers from their accounts, or unauthorized access to data or physical protections of the VPNAPS.

9.0 Data Security

- (a) The Gaming Enterprise shall implement and maintain reasonable security measures to protect those records containing Personally Identifiable Information from unauthorized access, acquisition, destruction, use, modification or disclosure. “Records” shall include, but not be limited to, private and financial information of all Account Holders and their accounts, including any loyalty awards. If a state or federal law requires greater protection to records that contain Personally Identifiable Information and the Gaming Enterprise is in compliance therewith, the Gaming Enterprise shall be deemed to be in compliance with the provisions of this Section.
- (b) With respect to subsection 9(a), reasonable security measures shall include, but not be limited to, the following:
- (1) Requiring passwords that are a minimum of 8 characters that include at least three of the following characteristics and ensure the proper authentication of Account Holders;
 - i. Uppercase letters;
 - ii. Lowercase letters;
 - iii. Numbers; or
 - iv. Special Characters.
 - (2) Complying with the current version of the Payment Card Industry (PCI) Data Security Standard, as adopted by the PCI Security Standards Council or its successor organization, with respect to those transactions, not later than the date for compliance set forth in the Payment Card Industry (PCI) Data Security Standard or by the PCI Security Standards Council or its successor organization;
 - (3) Encrypting the transfer of any Personally Identifiable Information through an electronic, non-voice transmission to a Person outside of the VPNAPS or when moving any Data

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Storage Device containing personal information beyond the logical or physical controls of the Gaming Enterprise, its data storage contractor or, if the Data Storage Device is used by or is a component of a Multifunctional Device, a Person who assumes the obligation of the Gaming Enterprise to protect personal information;

- (4) Locating gaming platforms and the associated communications systems in facilities which provide physical protection against damage from fire, flood, hurricane, earthquake and other forms of natural or man-made disaster;
 - (5) Adopting and implementing security perimeters and secure areas protected by appropriate entry controls to ensure that access is restricted to authorized personnel;
 - (6) Ensuring equipment is protected from power failures and other disruptions caused by failures in supporting utilities, and that power and telecommunications cabling carrying data or supporting information services shall be protected from interception or damage; and
 - (7) Ensuring secure areas include an intrusion detection system with the ability to detect and log any unauthorized access or attempts to gain unauthorized access.
- (c) Records containing Personally Identifiable Information shall be subject to reasonable measures to ensure the destruction of those records when the Gaming Enterprise determines that the records will no longer be maintained following expiration of the maintenance and preservation requirements set forth in subsection 19(c). For purposes of this subsection, reasonable measures to ensure the destruction includes any method that modifies the records containing the Personally Identifiable Information in such a way as to render the personal information contained in the records unreadable or undecipherable, including, without limitation: (1) shredding of the record containing the Personally Identifiable Information; or (2) if in electronic form, erasing of the Personally Identifiable Information from the hard disks, magnetic tapes, solid state memory and other Data Storage Devices or Multifunctional Devices before the device is decommissioned; if

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erasure is not possible, the Data Storage Device or Multifunctional Device must be destroyed.

- (d) Any breach of security of VPNAPS data (including, but not limited to, Data Storage Devices and Multifunctional Devices) must be immediately disclosed following discovery if Personally Identifiable Information was, or is reasonably believed to have been, acquired by an unauthorized Person. The disclosure must be made in the most expedient time possible and without unreasonable delay to the Gaming Commission, consistent with the legitimate needs of law enforcement or any measures necessary to determine the scope of the breach and restore the reasonable integrity of the VPNAPS data.
- (e) The Gaming Enterprise shall be in compliance with, and shall ensure that the VPNAPS data is in compliance with:
 - (1) The Gramm-Leach-Bliley Act, 15 U.S.C. §§ 6801 *et seq.*;
 - (2) The Children's Online Privacy Protection Act, 15 U.S.C. §§ 6501–6506;
 - (3) Sarbanes-Oxley, 15 U.S.C. §§ 7241 *et seq.*; and
 - (4) Controlling the Assault of Non-Solicited Pornography And Marketing Act of 2003 (CAN SPAM), §§ 15 U.S.C. 7701 *et seq.*

10.0 Disaster Recovery and Redundancy

One or more of the following methods to support redundancy and disaster recovery shall be utilized:

- (a) Hardware: Procedures required to ensure redundancy and disaster recovery of the VPNAPS or components thereof include, but are not limited to:
 - (1) Redundant hardware, such as network interface cards operating in parallel, which shall ensure the continuous function of the VPNAPS in the event that a component thereof fails;

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- (2) High-availability hardware, such as identically configured routers, which shall continue to function without administrative action if a VPNAPS component fails;
 - (3) Exact copies of Critical Components that can be readily swapped or replaced in the event of a failure;
 - (4) Mirroring all data, including changes, by replicating such data to a second location in real-time to facilitate the replacement of Critical Components or the restoration of data in the event of a failure; and
 - (5) Employing multiple data centers or sites, i.e. a primary and secondary site, the latter of which can be utilized in the event of a major emergency and/or natural disaster at the primary site.
- (b) Network: Procedures required to ensure network backup include, but are not limited to:
- (1) Creation and documentation of a disaster recovery plan that defines the necessary level of backup information;
 - (2) Maintaining accurate and complete records of backup material in accordance with the documented disaster recovery plan;
 - (3) Establishing and documenting backup and restoration procedures consistent with industry standards or such standards that are accepted by the Gaming Commission;
 - (4) Storing backup data in a remote location sufficiently removed from the primary site to escape damage but accessible for timely data availability.
 - (5) Affording backup data with a level of physical and environmental protection consistent with the standards and controls applied at the primary site consistent with industry standards or such standards that are accepted by the Gaming Commission;
 - (6) Regularly testing backup data to ensure that it can be relied upon for emergency use when necessary;

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- (7) Regularly checking and testing restoration procedures to ensure that they are effective and can be implemented within the time allotted in the disaster recovery plan; and
- (8) Encrypting backup data that contains Personally Identifiable Information using technology that has been adopted by an established standard setting body or such technology that is accepted by the Gaming Commission.

11.0 Class II Bingo Rules

- (a) Written and comprehensive Class II bingo rules shall be adopted, adhered to and available for review at all times by Account Holders through a conspicuously displayed link on the Patron Registration Site of the VPNAPS. Such Class II bingo rules shall include, but not be limited to, specifying the following:
 - (1) Clear and concise explanation of all fees;
 - (2) The rules of play of a Class II bingo game;
 - (3) Any monetary limits on Class II Gaming activities; and
 - (4) Any time limits pertaining to the play of a Class II bingo game.

Prior to adopting or amending such house rules, such Class II bingo rules shall be submitted to the Gaming Commission for its approval.

- (b) A Gaming Enterprise employee monitoring the proxy functions of the VPNAPS shall act as the legally designated agent of the Account Holder and, assisted by the technologic aid of proxy software elements contained in the VPNAPS, shall conduct proxy play of Class II bingo games on the Account Holder's behalf.
- (c) There is no requirement for the proxy agent playing Class II bingo games on the Account Holder's behalf to manually declare a "bingo" upon matching the numbers drawn with the pre-designated game winning pattern on a purchased bingo card in order to collect the game prize; use of technologic aids such as an auto-daub feature is expressly permitted to assist the proxy agent playing Class II bingo games on the Account Holder's behalf in determining whether

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a card held has a pre-designated pattern matching the numbers drawn for the Class II bingo game.

12.0 Information Displayed on the Patron Registration Site of the VPNAPS

- (a) The following information must be prominently displayed to Account Holders on the Patron Registration Site of the VPNAPS before any Class II bingo game play is commenced on behalf of an Account Holder:
- (1) The full name of the Gaming Enterprise, ownership of the Gaming Enterprise, and the physical location from which the Gaming Enterprise conducts its Class II Gaming activities;
 - (2) A statement that the Gaming Enterprise is licensed and regulated by the Gaming Commission;
 - (3) The license number and date of the license issued to the Gaming Enterprise, if applicable;
 - (4) A statement that individuals under the age of twenty-one (21) are not permitted to become Account Holders; and
 - (5) Active links to the following:
 - i. Information explaining how disputes with the Gaming Enterprise concerning VPN Aided Class II Gaming are resolved;
 - ii. A problem gambling website that is designed to offer information pertaining to responsible gaming;
 - iii. The Gaming Commission's website;
 - iv. A page that allows Account Holders to choose to be excluded from engaging in VPN Aided Class II Gaming or to establish time and monetary limits; and
 - v. A link to the Class II bingo rules of the Gaming Enterprise.

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- (b) While Account Holders are logged into the VPNAPS, the following information must be prominently displayed on the Patron Registration Site at all times:
 - (1) Real time information reflecting the Account Holder's account balance denominated in US dollars.

13.0 Problem Gambling

- (a) Policies and procedures for self-exclusion must be in place and all reasonable steps to immediately refuse service to or otherwise prevent an individual who has self-excluded from being an Account Holder with the Gaming Enterprise must be taken. These policies and procedures shall comply with Gaming Commission Regulation SYGC 14-I002 Responsible Gaming and will include without limitation the following:
 - (1) The closing of the account held by the Account Holder who has self-excluded;
 - (2) The maintenance of a register of those individuals who have self-excluded that includes the name, address and account details of self-excluded individuals;
 - (3) Provisions precluding an individual who has self-excluded from being allowed to again become an Account Holder with the Gaming Enterprise until a reasonable amount of time of not less than thirty (30) days has passed since the individual self-excluded; and
 - (4) Employee training to ensure enforcement of these policies and procedures.
- (b) All reasonable steps to prevent any marketing material from being sent to an individual who has self-excluded must be taken.
- (c) Any advances in information about problem gambling, technology to discover problem gambling, and techniques for combating problem gambling must be noted and acted appropriately upon.
- (d) Account Holders may, by written notice to the Gaming Enterprise, set a limit on their account activity in accordance with the following means:

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- (1) Establishing a limit on the amount of funds that the proxy agent can use to make purchases on the Account Holder's behalf indefinitely or for a specified period;
 - (2) Establishing a limit on the number of Class II bingo games and on the maximum number of bingo cards the proxy agent can play on the Account Holder's behalf indefinitely or for a specified period;
 - (3) Establishing a limit on the amount of funds the Account Holder may deposit daily into their account indefinitely or for a specified period; and
 - (4) Specifying that the Account Holder wishes to be excluded permanently, or for a specific period of time, from the Gaming Enterprise and VPN Aided Class II Gaming.
- (e) An Account Holder may, by written notice to the Gaming Enterprise, change or remove the limit on the Account Holder's account activity by further written notice to the Gaming Enterprise. Written notice increasing or removing a limit shall not have effect until at least twenty-four (24) hours after such notice is received.
- (f) In the event that an Account Holder self-excludes or has been permanently banned, all funds shall be returned to the Account Holder individual and their account with the Gaming Enterprise closed within seven (7) business days after receipt of the Account Holder's notice of self-exclusion or the issuance of a permanent ban by the Gaming Enterprise.
- (g) The Gaming Enterprise shall establish adequate controls to ensure a permanently banned Account Holder cannot reestablish an account with the Gaming Enterprise.

14.0 Registration of Account Holders

- (a) The Gaming Enterprise shall not permit an individual to establish an account with the Gaming Enterprise unless the individual is registered and satisfies all the requirements for becoming an Account Holder.
- (b) An individual shall use the VPNAPS to register as an Account Holder.

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- (c) To register as an Account Holder, the individual shall provide the following information:
- (1) The individual's full legal name;
 - (2) The individual's date of birth showing that the individual is eighteen (18) years of age or older;
 - (3) The individual's legal address;
 - (4) The individual's valid email address;
 - (5) Confirmation that the individual has not previously self-excluded with the Gaming Enterprise and does not otherwise remain on the self-exclusion list; and
 - (6) Confirmation that the individual has not been permanently banned by the Gaming Enterprise.
- (d) Before the Gaming Enterprise registers an individual as an Account Holder, the individual must affirm the following:
- (1) That the registration information provided is accurate;
 - (2) That the individual has reviewed and agrees to the Gaming Enterprise's Class II bingo rules associated with VPN Aided Class II Gaming;
 - (3) That the individual has reviewed and agrees to the Gaming Enterprise's terms of service and applicable privacy policies associated with VPN Aided Class II Gaming;
 - (4) That the individual has been informed and understands that, as an Account Holder, they are prohibited from allowing any other individual access to or use of their account;
 - (5) That the individual has been informed and understands that, as an Account Holder, they are prohibited from establishing more than one account with the Gaming Enterprise;
 - (6) That the individual has been informed and understands that, if the information provided by such individual pursuant to subsection 14(c) cannot be verified within thirty (30) days of

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registration, any prize winnings credited to the individual's account will be forfeited and the individual shall have no right to such prize winnings;

- (7) That by establishing an account with the Gaming Enterprise the individual consents to the exclusive regulatory and adjudicatory jurisdiction of the Nation, acknowledges that the individual is authorizing proxy play of Class II bingo games on their behalf and the Gaming Enterprise's VPN Aided Class II Gaming is conducted on the Nation's sovereign Indian lands, and agrees that any disputes between the individual and the Gaming Enterprise concerning VPN Aided Class II Gaming shall be resolved exclusively pursuant to procedures established by the Gaming Enterprise consistent with Gaming Commission regulations; and
 - (8) That the individual consents to the monitoring and recording by the Gaming Enterprise and the Gaming Commission of any of their account activities.
- (e) Where it is known or reasonably should be known that an individual has provided false information, or the Gaming Enterprise has identified through a mechanism that complies with industry standards or such standards that are accepted by the Gaming Commission that the individual does not satisfy all the requirements for becoming an Account Holder, such individual shall not be permitted to register as an Account Holder.
- (f) Within thirty (30) days of the registration, the information provided by the individual pursuant to subsection 14(c) shall be verified by the Gaming Enterprise. Until such verification has occurred:
- (1) The individual may not deposit more than \$5,000.00 (US) in their account; and
 - (2) The individual may not withdraw any funds from their account.
- (g) If verification of the information provided by the individual pursuant to subsection 14(c) has not occurred within thirty (30) days or where it becomes known that such information is false, the following action shall be taken by the Gaming Enterprise:

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- (1) Immediately terminate the individual's account activities;
 - (2) Retain any prize winnings credited to the individual's account; and
 - (3) Refund the balance of deposits made to the individual's account to the source of such deposit or by issuance of a check and then permanently close the individual's account.
- (h) Where it becomes known that an individual who has been previously self-excluded or permanently banned has registered for an account without proper authorization from the Gaming Enterprise, the following action shall be taken by the Gaming Enterprise:
- (1) Immediately terminate the individual's account activities;
 - (2) Retain any prize winnings credited to the individual's account; and
 - (3) Refund the balance of any deposits made to the individual's account to the source of such deposit or by issuance of a check and then permanently close the individual's account.
- (i) Upon verification of the information provided by the individual pursuant to subsection 14(c), any prize winnings credited to that Account Holder's account shall be immediately made available for withdrawal by the Account Holder.

15.0 Account Holders Information and Account Restrictions

- (a) The following information relating to an Account Holder shall be recorded and maintained by the Gaming Enterprise:
- (1) The date and time an account with the Gaming Enterprise is established or terminated by the Account Holder;
 - (2) The date and time the Account Holder logs into and out of the VPNAPS; and
 - (3) The physical location of the Account Holder, by state or foreign jurisdiction, while logged into the VPNAPS.

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- (b) All Account Holders shall have reasonable access to their account information including, but not limited to, the following:
 - (1) All credits and debits to the Account Holder's account;
 - (2) A complete history for every Class II bingo game played by the proxy agent on the Account Holder's behalf , including:
 - i. The date and time a Class II bingo game began and ended;
 - ii. The outcome of every Class II bingo game; and
 - iii. The amounts used to purchase bingo cards and the prize amounts won in connection with every Class II bingo game played by the proxy agent on the Account Holder's behalf.
- (c) The following account restrictions shall apply:
 - (1) An individual registered as an Account Holder may only register and maintain a single account; and
 - (2) No anonymous accounts or accounts in fictitious names may be established.
- (d) A list of all Account Holders and their respective accounts shall be maintained at all times by the Gaming Enterprise.
- (e) An Account Holder shall not be allowed to transfer funds to any other Account Holder's account.
- (f) All accounts shall require a specified password unique to each Account Holder for logging in to the account.
- (g) All Account Holders shall be required to change their passwords at least annually or on an interval established by the Gaming Commission.

16.0 Access to VPN Aided Class II Gaming Via the VPNAPS

No Person shall be permitted access to VPN Aided Class II Gaming via the VPNAPS:

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- (a) When it is known or reasonably should be known that the individual is on the self-exclusion list for the Gaming Enterprise;
- (b) When it is known or reasonably should be known that the individual is in violation of this Regulation's requirements for Account Holders; or
- (c) When it is known or reasonably should be known that the individual is physically located in a state or foreign jurisdiction from which access to the Patron Registration Site of the VPNAPS or VPN Aided Class II Gaming via the VPNAPS has been restricted or limited, either as required by the Gaming Commission or determined by the Gaming Enterprise.

17.0 Financial Stability and Funds Security

- (a) Funds are permitted to be deposited by an Account Holders into the account assigned to that Account Holder as follows:
 - (1) Cash deposits made directly with the Gaming Enterprise;
 - (2) Personal checks, cashier's checks, wire transfer and money order deposits made directly or mailed to the Gaming Enterprise;
 - (3) Debits from an Account Holder's Visa or MasterCard debit or credit card;
 - (4) Transfers through the automated clearing house or from another mechanism designed to facilitate electronic commerce transactions; or
 - (5) Any other means approved by the Gaming Commission.
- (b) An Account Holder's account may be credited by the following means:
 - (1) Deposits made in accordance with subsection 17(a);
 - (2) Prize award payments in connection with every Class II bingo game played by the proxy agent on the Account Holder's behalf;

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- (3) Promotional credits, or bonus credits that are subject to the terms of service and Class II bingo rules established by the Gaming Enterprise as long as such credits are clearly identified as such; and
 - (4) Adjustments following the resolution of a dispute between the Account Holder and the Gaming Enterprise concerning the Account Holder's account activities.
- (c) An Account Holder's account may be debited by the following means:
- (1) Amounts used to purchase bingo cards in connection with every Class II bingo game played by the proxy agent on the Account Holder's behalf;
 - (2) Purchases of VPN Aided Class II Gaming related merchandise and services requested by an Account Holder;
 - (3) Withdrawals by the Account Holder pursuant to the withdrawal policy established by the Gaming Enterprise;
 - (4) Adjustments following the resolution of a dispute between the Account Holder and the Gaming Enterprise concerning the Account Holder's account activities; and
 - (5) Debits as otherwise approved by the Gaming Commission.
- (d) Funds deposited into an Account Holder's account from a financial institution shall not be transferred out of the account to a different financial institution except as otherwise allowed by the Gaming Commission.
- (e) Unless there is a pending unresolved dispute or investigation concerning the Account Holder's account activities, a request for a withdrawal of funds by an Account Holder from their account shall be fulfilled within a reasonable amount of time. Any processing of accounts fund withdrawals pursuant to a request by the Account Holder shall be in compliance with all applicable federal and state laws concerning applicable income taxes to be paid by the Account Holder. Before remitting funds to an Account Holder, such time as is reasonably necessary shall be taken for the purposes of:

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- (1) Verifying the Account Holder's status as an Account Holder is in good standing;
 - (2) Conducting security and other internal control procedures in relation to the Account Holder's account, including verification of the withdrawal request against funds in the Account Holder's account; and
 - (3) Ensuring compliance with the applicable Gaming Enterprise rules relating to the awarding of prizes to the Account Holder's account.
- (f) An Account Holder shall not be allowed to transfer funds to any other Account Holder's account.
 - (g) An Account Holder's account shall not be allowed to be overdrawn unless caused by payment processing issues outside the control of the Gaming Enterprise.
 - (h) Extension of credit to an Account Holder shall not be permitted nor shall the deposit of funds into an Account Holder's account that are derived from the extension of credit by affiliates or agents be allowed. For purposes of this subsection, credit shall not be deemed to have been extended where, although funds have been deposited into an account, actual receipt of such funds is pending in the ordinary course of business.
 - (i) If an Account Holder's account is inactive for twelve (12) consecutive months or more, a maintenance fee may be charged subject to approval of Gaming Commission. The monthly maintenance fee will be deducted from the Account Holder's account each consecutive month thereafter if it remains inactive. The monthly maintenance fee will not be deducted from the account if there are no funds in account. However, if the Account Holder's account has no funds and has been inactive for twelve (12) or more consecutive months the account may be closed.
 - (j) The Gaming Enterprise shall keep the account funds of Account Holders separate from the Gaming Enterprise's own funds in an account held with a financial institution approved by the Gaming Commission.

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- (k) The financial institution at which the account funds of Account Holders are held shall be instructed and authorized to disclose any information as may be requested by the Gaming Commission relating to Account Holders' accounts.
- (l) Each financial institution which holds either the Gaming Enterprise's own funds or the account funds of Account Holders shall be pre-approved by the Gaming Commission. The financial institution shall be in good standing and use accounting standards and practices as is generally accepted in the industry.
- (m) Upon receipt of a formal request from an Account Holder, the Gaming Enterprise shall provide in a reasonable manner to such Account Holder all details of amounts credited and/or debited to such Account Holder's account that are not otherwise accessible through the Account Holder's account.

18.0 Reserve Requirements

In order to ensure the Gaming Enterprise has sufficient funds on hand, the Gaming Enterprise must meet minimum amounts or formulas of cash on hand or in a financial institution in the amounts or pursuant to the formulas established by the Gaming Commission.

19.0 Records

- (a) With respect to the transactions and affairs relating to the conduct of VPN Aided Class II Gaming, proper accounts and records shall be kept by the Gaming Enterprise which reflects a true, accurate and fair view of the financial position and state of affairs of the Gaming Enterprise's VPN Aided Class II Gaming operations.
- (b) In addition to any other records required to be maintained pursuant to this Regulation, complete and accurate records of all matters related to the conduct of VPN Aided Class II Gaming shall be maintained by the Gaming Enterprise, including without limitation the following:
 - (1) The identity of all current and prior Account Holders;
 - (2) All information used to register an Account Holder;

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- (3) A record of any changes made to an Account Holder's account;
 - (4) A record and summary of all person-to-person contact, by telephone or otherwise, with an Account Holder;
 - (5) All credits and debits to an Account Holder's account;
 - (6) A complete game history for every Class II bingo game played by the proxy agent on the Account Holder's behalf, including the date and time a Class II bingo game begins and ends, the outcome of every Class II bingo game, the amounts used to purchase bingo cards and the prize amounts won in connection with every Class II bingo game played by the proxy agent on the Account Holder's behalf; and
 - (7) Disputes arising between the Account Holder and the Gaming Enterprise concerning the Account Holder's account activities.
- (c) All records required by this Regulation shall be maintained and preserved by the Gaming Enterprise for a minimum of five (5) years after they are made, or for an amount of time deemed appropriate by the Gaming Commission.

20.0 Advertising and Promotions

- (a) No advertising or promotions shall be engaged by the Gaming Enterprise in that are:
 - (1) Indecent, pornographic or offensive;
 - (2) False, deceptive or misleading;
 - (3) Intended to appeal specifically to individuals under the age of twenty-one (21); or
 - (4) In breach of copyright laws.
- (b) Any promotion related to VPN Aided Class II Gaming shall clearly and concisely explain the terms of the promotion and adhere to such terms.

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21.0 Grounds for Disciplinary Action

- (a) Failure to comply with the provisions of this Regulation shall be an unsuitable method of operation and grounds for disciplinary action against any Person licensed by the Gaming Commission.
- (b) The Gaming Commission may limit, condition, suspend, revoke a license or fine any Person licensed by the Gaming Commission for failing to comply with this Regulation.

22.0 Qualifications for Endorsed Independent Testing Laboratories

- (a) An endorsed independent testing lab is an independent or governmental gaming testing laboratory recognized in the gaming industry and which:
 - (1) Is competent and qualified to conduct scientific tests and evaluations of Class II Gaming Systems and their Class II bingo games, hardware, software and accounting systems; and
 - (2) Is licensed or approved by any of the following states: Arizona, California, Colorado, Illinois, Indiana, Iowa, Michigan, Minnesota, Missouri, Nevada, New Jersey, or Wisconsin.
- (b) The endorsed independent testing lab shall submit to the Gaming Commission documentation that demonstrates it satisfies the qualifications required under subsection 22(a) before certifying the VPNAPS and its Class II bingo games, hardware, software and accounting systems.
- (c) If, at any time, the endorsed independent testing lab's license and/or approval required by subsection 22(a)(2) is suspended or revoked by any of those states or the Gaming Commission determines that the endorsed independent testing lab is not eligible for a Gaming Vendor License under the Gaming Ordinance, then the Gaming Commission may reject the further use of the independent testing lab, and upon such rejection, the independent testing lab shall discontinue any certifying of the VPNAPS and its Class II bingo games, hardware, software and accounting systems.

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23.0 Resolution of Account Holder Disputes

- (a) The Nation values each Account Holder with the Gaming Enterprise and intends, at all times, to see that questions, concerns, issues, and/or disputes raised by Account Holders concerning their account activity are addressed in a fair and orderly manner. **However, nothing in this Section specifically nor this Regulation generally shall constitute or be construed as a waiver of the Nation's sovereign immunity, or any of the Nation's rights and privileges arising therefrom.** The Gaming Commission's Patron Dispute Process is outlined in Commission Regulation SYGC 14-I006.
- (b) Dispute Resolution Procedure
- (1) Account Holders who, in the course of the their otherwise lawful and proper use their account with the Gaming Enterprise, have questions or concerns about their account activity or any aspect of the Gaming Enterprise's VPN Aided Class II Gaming, or who otherwise believe themselves to be aggrieved in connection with their account activity or any aspect of the Gaming Enterprise's VPN Aided Class II Gaming, shall direct their questions, concerns, issues, complaints or disputes (hereinafter collectively "Disputes") in the first instance to the Gaming Enterprise in a manner established in the Gaming Enterprise's terms of service associated with VPN Aided Class II Gaming .
 - (2) Disputes shall be raised by the Account Holder as soon as reasonably possible after the event that gives rise to the Dispute; however, no Dispute may be raised more than ten (10) calendar days after the triggering event.
 - (3) Upon being notified of an Account Holder Dispute, the Gaming Enterprise shall first attempt to informally resolve the matter expeditiously via a customer care system established in the Gaming Enterprise's terms of service associated with VPN Aided Class II Gaming.
 - (4) Upon being notified that Account Holder remains dissatisfied by the informal resolution of the Dispute, the Gaming Enterprise shall expediently and informally gather facts and

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documentation concerning the Dispute sufficient for an initial determination to be made about the Dispute (i.e., whether the Dispute has any merit, whether further investigation is required, whether to take any corrective action, etc.). In the event that the Dispute concerns debits or credits of funds to an Account Holder's account with the Gaming Enterprise, all disputed amounts may be frozen until final resolution of the Dispute.

- (5) In a manner established in the Gaming Enterprise's terms of service associated with VPN Aided Class II Gaming, the Gaming Enterprise shall forward the Dispute and the collected facts and documentation concerning the dispute to the Gaming Commission who will make a determination regarding any additional investigation and notify the Account Holder of the status of the complaint.
- (6) The Gaming Commission representative shall inform the Account Holder in a manner established in the Gaming Enterprise's terms of service associated with VPN Aided Class II Gaming and pursuant to SYGC 14-I006 of the initial determination as soon as is reasonably practicable. At that time, if the Account Holder indicates that they are still not satisfied with the initial determination, the Account Holder may appeal the decision directly to the Gaming Commission in a manner outlined in SYGC 14-I006.

24.0 Waiver of Requirements of Regulation

Upon written request and good cause shown, the Gaming Commission may waive one or more of the requirements of this Regulation. If a waiver is granted, the Gaming Commission may impose alternative requirements.

Approved by:

September 4, 2014

Dave Vialpando, Chairman

Date

Rev. 10-21-2014; 11-10-2014

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