

SENECA - CAYUGA
—▲—
NATION

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May 16, 2016

Fellow Tribal Members:

As stated in my February 2016 newsletter, I discussed the investigation that was recently conducted by the National Indian Gaming Commission (NIGC). If you recall, we experienced a serious situation at our casino because of the previous Chief's approval of a perpetual vendor contract, thus creating an ongoing investigation into all of the vendor contracts that our casino has entered into. This time they are specifically looking into a Poydras Gaming contract with Grand Lake Casino.

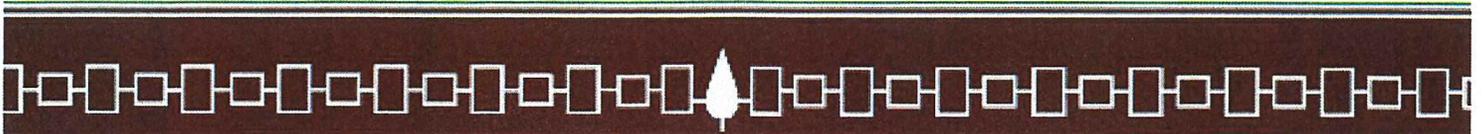
The attached letter, dated May 3, 2016, from the NIGC is once again requesting copies of all contracts, any in-kind payments to "brokers", W-2s/1099s and any development agreements made specifically between the Nation and Poydras Gaming. Our Gaming Commissioner and attorneys are working attentively with the NIGC to provide the documents requested. We could receive severe penalties should the NIGC find further dubious contracts signed by the former Chief or previous General Manager of the Casino. The Sourcepoint vendor contract was just one of the contracts that the former Chief signed that created a severe blow to the credibility of this Nation.

As soon as we have more information I will let everyone know the details.

Respectfully,



William L. Fisher, Chief





May 3, 2016

Via Facsimile (918) 787-5521

William L. Fisher, Chief
Seneca-Cayuga Nation
23701 South 655 Road
Grove, OK 74344

Re: Second Document Request

Investigation – Management Without an Approved Contract/Sole Proprietary Interest

Dear Chief Fisher:

The National Indian Gaming Commission completed its review of the documents submitted in response to the first document request for the investigation into whether SourcePoint, LLC managed the operation of gaming machines at the Seneca-Cayuga Nation's Grand Lake Casino without an NIGC approved management contract in violation of the Indian Gaming Regulatory Act¹, NIGC regulations², and the Nation's Gaming Ordinance³; or whether the term, level of control, and payments to SourcePoint, LLC pursuant to the Amended and Restated Agreement between the Nation and SourcePoint, LLC violated the sole proprietary interest mandate of the IGRA⁴, NIGC regulations⁵, and the Nation's Gaming Ordinance⁶.

After review of your submission to the first document request the agency requests additional information.⁷ Please provide the following documents, including facsimiles, copies, handwritten notes, email, electronically stored documents, electronically recorded telephone messages, taped recordings, and pertinent information stored on all other media to the Tulsa Region Office by close of business June 3, 2016:

1. Copies of any and all contracts between the Nation and any "Brokers" authorized by the Nation to identify and develop potential entities, such as SourcePoint, LLC, to enter into agreements for the lease of gaming machines to replace Caywil New York, LLC ;

¹ Indian Gaming Regulatory Act, 25 U.S.C. § 2711(a)(1).

² 25 C.F.R. § 533.1.

³ Seneca-Cayuga Tribe of Oklahoma Gaming Ordinance, §1.14.

⁴ Indian Gaming Regulatory Act, 25 U.S.C. § 2710(b)(2)(A).

⁵ 25 C.F.R. § 522.4(b)(1).

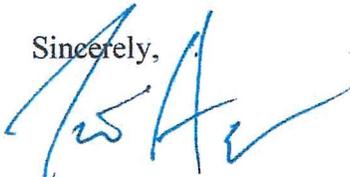
⁶ Seneca-Cayuga Tribe of Oklahoma Gaming Ordinance, §1.5.

⁷ Indian Gaming Regulatory Act, 25 U.S.C. §2706(b)(4); 25 C.F.R. § 571.6.

2. Copies of any and all W-2/1099 forms issued by the Nation to said "Brokers";
3. Listing of any in-kind payments made to said "Brokers";
4. Copies of any and all contracts between the Nation and Poydras (management, development, consulting, leasing, vendor, financing, employment, etc.);
5. Copies of any and all other contracts between the Nation and any other companies currently providing or leasing gaming machines;
6. The names of all people who compiled and/or authorized the responses to this document request, including certifications that the responses are complete and accurate.

I appreciate your cooperation in this matter. If you have any questions, please feel free to contact me at (918) 581-7924, or by email at Tim_Harper@nigc.gov, or Senior Compliance Officer Brian Moody at (918) 581-7924, or by email at Brian_Moody@nigc.gov.

Sincerely,



Tim Harper
Tulsa Region Director

Cc:

Nancy Green, Esq.

Elizabeth Homer, Esq.

Danielle Brashear, Gaming Commissioner