



# Waganakising Odawak

Little Traverse Bay Bands of Odawa Indians

## Office of Tribal Chairperson

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### GAMING REGULATORY SPORTS BETTING REGULATIONS REG-WOS 2011-005 081820-001

I. **Purpose:** To establish supplemental gaming regulations governing Sports Betting.

#### II. DEFINITIONS

(a) "Book" means a sports pool licensed and approved pursuant to LTBB Tribal Law and this regulation.

(b) "Gaming Regulatory Commission" means the LTBB Gaming Regulatory Commission or designee.

(c) "Communications technology" means the methods used and the components employed to facilitate the transmission of information including, but not limited to, transmission and reception systems based on wire, cable, radio, microwave, light, optics, or computer data networks.

(d) "Mobile gaming" means the placing of wagers with an LTBB casino through a server-based gaming system located on approved Tribal Lands using a computer network through which the casino may offer an online sports pool to individuals who have established a wagering account with the casino and who are physically present within the property boundaries of LTBB approved Tribal Lands.

(e) "Regulatory Director" mean the Regulatory Director of the LTBB Gaming Regulatory Commission or the Regulatory Director's designee.

(f) Reserved

(g) "Sports pool" means the business of accepting wagers on collegiate or professional sporting events or athletic events or other similar events

(h) "Sports wager" means a sports pool wager other than one offered to be included in a common pari-mutuel pool.

(i) "Wagering account" means an electronic account that may be established by a patron at a casino property for the purpose of wagering pursuant to these regulations, including deposits, withdrawals, wagered amounts, and payouts on winning wagers.

(j) "Wagering communication" means the transmission of a wager between a point of origin and a point of reception by aid of a communications technology.

(k) "Wagering system" means the methodology and equipment approved by the Gaming Regulatory Commission for accepting and recording wagers authorized by these regulations.

#### III: LICENSING

Approved by Tribal Council 090320

Approved by the Executive – 081820

Gaming Regulatory Sports Betting Regulations

REG – WOS 2011-005 -081820-001

(a) No person or entity may operate a sports pool on LTBB Tribal Land unless that person or entity holds a LTBB issued gaming license that has been issued in accordance with LTBB Gaming Regulations.

(b) A LTBB gaming facility may offer a sports pool within its licensed gaming facility or mobile gaming on approved Tribal Lands after receiving approval from the LTBB Gaming Regulatory Commission.

(c) A person or entity that a LTBB gaming facility contracts with to assist in the offering of sports pool wagering by providing operational, technical or other associated support shall obtain a Key Contractor/Gaming Vendor license from the Gaming Regulatory Commission.

Applications for such a license must be made, processed, and determined in the same manner as applications for gaming licenses, using such forms as the Commission may require. Employees of such a non-casino entity shall be licensed or permitted consistent with the applicable provisions of the LTBB Gaming Regulatory Statute and these Regulations.

(d) Each licensed operator of a sports pool must also comply with the internal control system approved by the Gaming Regulatory Commission prior to commencing operations.

#### IV: OPERATIONS

##### A. Reserve Requirements

(a) Notwithstanding the minimum bankroll required of licensed gaming operators, each book shall comply with the following to calculate additional minimum reserve requirements specifically for the book:

1. Each book shall at all times maintain access to a cash reserve of not less than the greater of \$50,000 or the sum of the following amounts:

- i. Amounts held by the book for the account of patrons;
- ii. Aggregate amounts accepted by the book as wagers on contingencies whose outcomes have not been determined; and
- iii. Amounts owed but unpaid by the book on winning wagers through the period established by the book for honoring winning wagers.

##### B. House Rules

(a) Each book shall adopt and adhere to written, comprehensive house rules governing wagering transactions with patrons. Such house rules must be immediately available to patrons at a book's licensed premises. Without limiting the generality of the foregoing, the rules must specify the types of wagers accepted, how winning wagers will be paid, the effect of schedule changes, the redemption period for winning tickets, and the method of noticing odds or line changes to patrons. House rules must state that wagers may be accepted at other than the currently posted terms, if applicable. Prior to adopting or amending such house rules, a book shall submit such rules to the LTBB Gaming Regulatory Commission for approval.

##### C. Issuance and Control of Betting Tickets

(a) Immediately upon accepting a wager, other than a wager made through an electronic Wagering account, the book shall create a betting ticket on which the terms of the wager are written. For all wagers, the book must have the capability to make a print, electronic or other

approved record of the entire transaction. The book's record of a player's confirmation of all wagers shall be deemed to be the transaction of record and such records shall be made available upon request.

(b) Betting tickets must bear the name and address of the book and instructions on ticket redemption in person or by mail or other approved method.

#### D. Acceptance of Wagers

(a) Books may not accept wagers unless made with cash, chips, tokens, or other representatives of value approved by the LTBB Gaming Regulatory Commission. A Wagering account must be established by a patron with the licensee, and deposits must be made to the account in-person by a patron at the licensee's premises before the acceptance of any wager that will utilize a Wagering account.

1. Books may not accept wagers from players:

- i. Under 19 years of age at Petoskey and under 21 years of age at Mackinaw.
- ii. On the exclusion list.

(b) A book shall accept wagers only on its licensed premises, and only at betting stations or kiosks/terminals approved by the LTBB Gaming Regulatory Commission or through an on-site computerized Wagering system that has been approved by the LTBB Gaming Regulatory Commission.

(c) A book shall not knowingly accept money or its equivalent ostensibly as a wager upon an event whose outcome has already been determined. A licensed sports pool shall not accept a wager on an event unless the date and time at which the outcome of the event is determined can be confirmed from reliable sources satisfactory to the LTBB Gaming Regulatory Commission or from records created and maintained by the book in such manner as the LTBB Gaming Regulatory Commission may approve.

(d) As part of its internal controls submission, a book shall provide the LTBB Gaming Regulatory Commission with a catalog of the type of events that it intends to accept wagers on. The LTBB Gaming Regulatory Commission reserves the right to prohibit the acceptance of wagers, and may order the cancellation of wagers and require refunds on any event.

(e) No book or agent or employee of a book may accept a wager from a person who the book, agent, or employee knows or reasonably should know is placing the wager for the benefit of another for compensation, or is placing the wager in violation of Tribal, state or federal law.

(f) No book may hold a patron's money or its equivalent on the understanding that the book will accept the money as a wager only upon the occurrence of a specified, future contingency, unless a betting ticket documenting the wager and contingency is issued immediately when the book receives the money or its equivalent.

(g) A sports pool may not accept wagers on a race or sporting event unless the wagering proposition is posted. Propositions may be posted by electronic or manual means, including printed media.

(h) A book may not unilaterally rescind any wager without the prior written approval of the LTBB Gaming Regulatory Commission.

#### E. Wagers and payouts exceeding \$10,000

(a) Prior to accepting any sports wager in excess of \$10,000 or making a payout in excess of \$10,000 on a winning sports wager the book shall:

1. Obtain the patron's name;

2. Obtain or reasonably attempt to obtain the patron's permanent address and social security number;
3. Obtain one of the following identification credentials from the patron:
  - i. Driver's license;
  - ii. Passport;
  - iii. Non-resident alien identification card;
  - iv. Other reliable government issued identification credentials; or
  - v. Other picture identification credential normally acceptable as a means of identification when cashing checks; and
4. Examine the identification credential obtained to verify the patron's name, and to the extent possible, to verify the accuracy of the information obtained pursuant to paragraph (2).

(b) Subsequent to accepting a sports wager in excess of \$10,000 or making a payout in excess of \$10,000 on a winning sports wager the book shall record or maintain records that include:

1. The patron's name;
2. The patron's address;
3. The patron's social security number;
4. A description including any document number of the identification credential examined (or credential information on file for known patrons);
5. The amounts of the wager and payout on the wager;
6. Window numbers or other identification of the locations where the wager and payout on the wager occurred;
7. The times and dates of the wager and payout on the wager;
8. The names and signatures of the book employees accepting or approving the wager and payout on the wager; and
9. Any other information as required by the LTBB Gaming Regulatory Commission.

A book shall not implement alternative procedures to comply with this subsection without the written approval of the LTBB Gaming Regulatory Commission.

(c) As used in this section, a "known patron" means an individual patron known to the book employees accepting the wager and paying the winning wager, for whom the licensee has previously obtained the patron's name and valid identification credential, and with respect to whom the licensee has on file and updates, at least every three years, all the information required to be recorded pursuant to this section.

(d) Reserved

(e) Each book shall report the wagers and payments on winning wagers required to be recorded pursuant to this section on a "Book Wagering Report," a form published or approved by the LTBB Gaming Regulatory Commission that includes, but is not limited to:

1. The patron's name;
2. The patron's identity credential information;
3. The patron's social security number;
4. Wager and payout amounts; and
5. Date of transactions.

Reports shall be submitted to the Commission no later than 15 days after the end of the month of the occurrence of the transaction and in such manner as the LTBB Gaming Regulatory Commission may approve or require. Each book shall file an amended report if the licensee

obtains information to correct or complete a previously submitted report, and the amended report shall reference to the previously submitted report. Each book shall retain a copy of each report filed for at least 5 years unless the LTBB Gaming Regulatory Commission requires retention for a longer period of time.

**F. Multiple Wagers**

(a) A book and its employees and agents shall not knowingly allow, and each book shall take reasonable steps to prevent, the circumvention of Section E. by multiple wagers within its designated 24-hour period with a patron or by the use of a series of wagers that are designed to accomplish indirectly that which could not be accomplished directly. As part of a book's efforts to prevent such circumventions relative to Section E. a book shall establish and implement wagering multiple transaction logs.

(b) Each book shall record in a wagering multiple transaction log all sports wagers in excess of \$2,500, or in smaller amounts that aggregate in excess of \$2,500 when any single officer, employee, or agent of the book has actual knowledge of the wagers or would in the ordinary course of business have reason to know of the wagers between the book and a patron or a person who the book knows or has reason to know is the patron's confederate or agent. This record shall be made for sports wagers occurring during a designated 24-hour period, within a monitoring area.

(c) Each log entry in a wagering multiple transaction log shall be made by the employee accepting or approving the wager, immediately after accepting the wager, and shall include at a minimum:

1. Description of the patron (or suspected agent), which may include such identifiers as age, sex, race, eye color, hair, weight, height and attire, if the person is present when the wager is accepted;
2. Patron's name (or suspected agent's name), if known;
3. Window number or other identification of the location where the wager occurred;
4. Time and date of the wager;
5. Dollar amount of the wager; and
6. Signature or electronic signature of person accepting or approving the wager.

One log shall be maintained for each monitoring area, for each designated 24-hour period. A log is completed for each 24-hour period regardless of whether any sports wagers occurred. At the conclusion of each designated 24-hour period, the last entry on the log shall be an indication that the end of the designated 24-hour period has occurred. A book shall not implement alternative procedures or records to comply with this subsection without the written approval of the LTBB Gaming Regulatory Commission.

(d) Each book shall aggregate all sports wagers in excess of \$2,500 or smaller amounts when any single officer, employee, or agent of the book has actual knowledge of the wagers or would in the ordinary course of business have reason to know of the wagers between the book and a patron or a person who the book knows or has reason to know is the patron's confederate or agent during a designated 24-hour period within a monitoring area.

(e) Before completing a wager that, when aggregated with other wagers pursuant to subsection d, will aggregate to an amount that will exceed \$10,000, the book shall complete the identification and recordkeeping requirements described in subsection (a) of Section E. When aggregated wagers exceed \$10,000, the book shall complete the recording and reporting requirements of Section E.

(f) If a patron places a wager that pursuant to subsection d is to be aggregated with previous wagers for which a record has been completed pursuant to this section or Section E., the book shall complete the identification, recordation and reporting procedures described in Section E. for any additional wager regardless of amount occurring during a designated 24-hour period.

(g) As used in this section:

1. "Designated 24-hour period" means the 24-hour period identified as gaming day for accounting purposes by the sports book and approved by the LTBB Gaming Regulatory Commission.
2. "Monitoring area" means all sports pool writing locations unless otherwise approved by the LTBB Gaming Regulatory Commission.

(h) reserved

#### G. Structured Wagers

(a) A book, its officers, employees or agents shall not encourage or instruct the patron to structure or attempt to structure wagers. This subsection does not prohibit a book from informing a patron of the regulatory requirements imposed upon the book, including the definition of structured wagers.

(b) A book, its officers, employees or agents shall not knowingly assist a patron in structuring or attempting to structure wagers.

(c) As used in this section, "structure wagers" or "structuring wagers" means to willfully conduct or attempt to conduct a series of wagers in any amount, at one or more books, on one or more days in any manner as to willfully evade or circumvent the recording and reporting requirements of Section E.. The wager or wagers need not exceed the dollar thresholds in Section E. at any single book in any single day in order to constitute structuring within the meaning of this definition.

#### H. Payment of Winning Wagers

(a) Except as otherwise provided in this subsection, books shall make payment on a winning wager to the person who presents the patron's copy of the betting ticket representing the wager. A book need not make payment to a person who the book or an agent or employee of the book knows is not the person to whom the patron's copy was issued. A book shall not make payment on a winning wager to a person who the book or its agent or employee knows or reasonably should know is collecting the payment on behalf of another for monetary consideration or in violation of federal law. A book may withhold payment of a winning wager if the patron refuses to supply identification or any other documentation required by state or federal law.

(b) As used in this section, "affiliated books" are books that are in Tribally licensed gaming establishments that are members of the Tribal Sports Betting Coalition. Presentment of the betting ticket and payment of the winning wager may be made at an affiliated book provided that:

1. An adequate accounting of the payment is kept for 5 years by both books; and
2. The payout is properly included in the computation of gross revenue of the licensee that initially accepted the wager.

(c) Books shall honor winning betting tickets for 30 days after the conclusion of the event wagered upon unless a longer period is established by the book. The book shall state the redemption period on each betting ticket, in house rules and on notices conspicuously placed about the licensed premises. Payment by mail may be made only after presentment of the betting

ticket and all identification information and documentation required by state or federal law, and must be made not later than 10 days after presentment.

(d) A licensed sports book shall determine the winners of or payouts on wagers on approved horse races only with information the book receives from licensed disseminators pursuant to the requirements of these Regulations.

#### I. Computerized Bookmaking Systems

(a) Before beginning operations, each book shall install and thereafter maintain a computerized bookmaking system meeting the specifications approved by the LTBB Gaming Regulatory Commission.

#### J. Layoff Bets

(a) A layoff wager means a wager placed by a Tribal book operator with another Tribal book operator for the purpose of offsetting patron wagers made pursuant to these regulations. A book operator may, in its discretion, accept a layoff wager from another Tribal book operator. An operator placing a layoff wager shall disclose its identity to the operator accepting the wager. Gaming Regulatory Commission approval is required for the list of other Tribal book operators.

#### K. Prohibited wagers

(a) No wagers may be accepted or paid by any book on:

1. Any amateur sport or athletic event other than;
  - i. Olympic sporting or athletic events sanctioned by the International Olympic Committee, subject to limitation by the LTBB Gaming Regulatory Commission or the LTBB Gaming Regulatory Commission's designee in his sole and absolute discretion, and
  - ii. Collegiate sporting or athletic events;
  - iii. Sanctioned eSports events;
2. Any sport or athletic event which the licensee knows or reasonably should know, is being placed by, or on behalf of a coach or participant in that event. Each licensee shall take reasonable steps to prevent the circumvention of this regulation;
3. The outcome of any election for any public office; and
4. Any event which the LTBB Gaming Regulatory Commission deems to be contrary to public policy.

(b) A request for approval to accept wagers on an event other than a horse race, sanctioned eSports event or an athletic sports event shall be made by a book on such forms approved by the LTBB Gaming Regulatory Commission, and shall include:

1. A full description of the event and the manner in which wagers would be placed and winning wagers would be determined.
2. A full description of any technology which would be utilized to offer the event.
3. Such other information or documentation which demonstrates that:
  - i. The event could be effectively supervised;
  - ii. The outcome of the event would be verifiable;
  - iii. The outcome of the event would be generated by a reliable and independent process;
  - iv. The outcome of the event would be unlikely to be affected by any wager placed;
  - v. The event could be conducted in compliance with any applicable laws; and
  - vi. The granting of the request for approval would be consistent with the public policy of the Tribe.

4. Such additional or supplemental information as the LTBB Gaming Regulatory Commission may require. The decision whether to grant approval to accept wagers on an event other than a horse race, or an athletic sports event shall be based on all relevant information including, but not limited to, the factors in subsection (b)(3) of this section. The LTBB Gaming Regulatory Commission may subject any technology that would be utilized to offer the event to such testing, investigation and approval process as deemed appropriate.

(c) The LTBB Gaming Regulatory Commission may grant, deny, limit, restrict or condition a request made pursuant to subsection (b) for any cause deemed reasonable. A book aggrieved by an administrative decision of the LTBB Gaming Regulatory Commission may submit the matter for review pursuant to appropriate and applicable statutory and regulatory provisions.

(d) The LTBB Gaming Regulatory Commission is hereby granted the authority to issue a suspension notice, revoking or suspending any administrative approval granted pursuant to subsection (c) for any cause deemed reasonable. A suspension notice shall be deemed delivered and effective when personally served upon the book, or if personal service is impossible or impractical, when deposited, postage prepaid, in the United States mail, to the book at its address as shown in the records of the commission. If a suspension notice revoking or suspending the administrative approval is issued, the effected book may request that the order be reviewed by the commission pursuant to appropriate and applicable statutory and regulatory provisions.

(e) Whenever the LTBB Gaming Regulatory Commission accepts a request for consideration, the request shall be deemed an application. Such application shall be included on the agenda of the next regularly scheduled meeting of the commission occurring more than 10 working days after receipt of the application. The commission, after considering the recommendation, may grant, deny, limit, restrict or condition the application for any cause it deems reasonable and the decision of the commission shall be final.

#### L. Reports of Suspicious Wagers

(a) As used in this section, "suspicious wager" means a wager which a sports pool licensee knows or in the judgment of it or its directors, officers, employees and agents has reason to suspect is being attempted or was placed:

1. In violation of or as part of a plan to violate or evade any federal, state or local law or regulation prohibiting wagering on any amateur non collegiate or collegiate sport or athletic event;
2. In violation of or as part of a plan to violate or evade any Tribal, federal, state or local law or regulation prohibiting wagering by, or on behalf of, a coach or participant in a sport or athletic event;
3. Has no business or apparent lawful purpose or is not the sort of wager which the particular patron would normally be expected to place, and the sports pool licensee knows of no reasonable explanation for the wager after examining the available facts, including the background of the wager; or
4. With knowledge or intent to violate the integrity of the sport in which it was placed. Wagers that indicate cheating, manipulation, or interference with the regular conduct of sport shall also trigger the reporting requirements of Section S.

(b) A sports pool licensee:

1. Shall file a report of any suspicious wager, regardless of the amount if the licensee believes it is relevant to the possible violation of any law or regulation.

(c) The report in subsection (b)(1) shall be filed no later than 30 calendar days after the initial



detection by the licensee of facts that may constitute a basis for filing such a report. In situations involving violations that require immediate attention, the licensee shall immediately notify, by telephone, appropriate staff of the commission in addition to timely filing a report.

(d) A licensee shall maintain a copy of any report filed and the original or business record equivalent of any supporting documentation for a period of three years from the date of filing the report. Supporting documentation shall be identified, and maintained by the licensee as such, and shall be deemed to have been filed with the report. A licensee shall make all supporting documentation available to the LTBB Gaming Regulatory Commission and any appropriate law enforcement agencies upon request.

(e) A licensee and its directors, officers, employees, or agents who file a report pursuant to this regulation shall not notify any person involved in the transaction that the transaction has been reported. Any Suspicious Activity report filed is confidential and may be disclosed only by the LTBB Gaming Regulatory Commission in the necessary administration of its duties and responsibilities under the LTBB Gaming Regulatory Statute. Any report, whether written or oral, is absolutely privileged under the LTBB Gaming Regulatory Statute and Title 31 and does not impose liability for defamation or constitute a ground for recovery in any civil action.

#### M. Wagers; Terms and Conditions

(a) A licensed gaming establishment where a book is located, or an affiliate of one or more of those entities that holds a gaming license, may award player loyalty program points based on wagers placed by a patron, however, such points may only be redeemed in accordance with the approved Odawa Casino policies.

(b) The LTBB Gaming Regulatory Commission may require a book to disclose its betting limits in its house rules and obtain approval from the LTBB Gaming Regulatory Commission before changing those limits or modifying its house rules; and document and report, in such manner as the LTBB Gaming Regulatory Commission may approve or require, wagering limits, temporary changes to such limits, or the acceptance of a wager or series of wagers from the same patron that exceeds such limits. The LTBB Gaming Regulatory Commission shall notify the book, in writing, of the decision to impose such requirements and such decision shall be considered a reviewable administrative decision.

(c) A book shall not offer a specialized wagering proposition, or set or move its wagering odds, lines or limits, in an attempt to provide a benefit to a patron.

(d) A book shall not set lines or odds, or offer wagering propositions, designed for the purposes of ensuring that a patron will win a wager or series of wagers.

#### N. Communications Technology

(a) Before installing or permitting the installation of any communications technology on the premises of a book, the book shall notify the LTBB Gaming Regulatory Commission in writing of the location and number or other identifier of each communications technology and shall obtain the written approval of the LTBB Gaming Regulatory Commission for each communications technology. The LTBB Gaming Regulatory Commission may condition the approval in any manner the LTBB Gaming Regulatory Commission considers appropriate.

(b) Before a book accepts any wagering communications, the book must obtain the written approval of the LTBB Gaming Regulatory Commission to accept such wagering communications and wagering instructions, and thereafter use only the communications technology approved for that purpose. The book must obtain written permission from the LTBB

Gaming Regulatory Commission by January 1st of each calendar year to continue using the communications technology.

(c) As a condition to the granting of the privilege of having communications technology upon the licensed premises, the book shall be deemed to have consented to the authority of the LTBB Gaming Regulatory Commission to require the immediate removal of any communications technology from the licensed premises at any time without prior notice of hearing. After any such removal, the book may request a hearing as to whether or not circumstances may warrant the permanent revocation of the privilege of having communications technology upon the premises.

(d) Upon the issuance of a LTBB Gaming License, a book has consented to the authority of the commission to examine and copy the records of any telephone, telegraph, or other communications company or utility that pertains to the operation of the book. A LTBB Vendor Hardware/Software Agreement will be completed and maintained on file.

#### O. Sports Pool Wagering by Electronic Means

(a) Notwithstanding any other provision of these regulations to the contrary, the LTBB Gaming Regulatory Commission may authorize electronic wagering to be conducted within an approved casino, hotel facility, and approved Tribal lands on mobile devices as approved by the LTBB Gaming Regulatory Commission.

(b) Approved mobile gaming requires, at a minimum, the following:

1. The player shall establish a wagering account through the property where mobile gaming will be conducted, and funds may only be deposited into the wagering account while the player is at the property where gaming is being conducted;

2. Wagers shall only be placed within a facility or locations approved by the LTBB Gaming Regulatory Commission for mobile gaming; and

3. The LTBB Gaming Regulatory Commission authorizes the device application for mobile gaming; provided that the LTBB Gaming Regulatory Commission may establish any additional or more stringent licensing and other regulatory requirements necessary for the proper implementation and conduct of mobile gaming as authorized herein.

(c) For the purposes of this provision, the approved facility shall include any area located within the property boundaries of the casino hotel facility and approved Tribal lands that the LTBB Gaming Regulatory Commission determines is legal for gaming.

(d) The LTBB Gaming Regulatory Commission shall ascertain and ensure, pursuant to rules and regulations approved by the Tribe to implement mobile gaming pursuant to this provision, that mobile gaming shall not extend outside of the property boundaries of the casino hotel facility and approved Tribal lands authorized for gaming.

#### P. Records and Forms

(a) Reserved

(b) Books shall create and maintain the records and reports required by this regulation using such forms as the LTBB Gaming Regulatory Commission may require or approve. The LTBB Gaming Regulatory Commission may require books to create and maintain such other records and reports as are necessary or convenient for strict regulation of books. Except as otherwise provided in this regulation, books shall preserve the records required by this regulation for at least 5 years after they are made. The commission may at any time examine and copy the records of any book. Each book shall comply with all other applicable regulations of the

commission to the extent not in conflict with this regulation.

**Q. Accounting**

(a) Each licensee shall prepare and maintain complete and accurate accounting records which shall include the amount wagered at each book, the gross revenue generated from wagers.

(b) The gross gaming revenue received by a licensee from sports wagering shall be calculated as the amount wagered minus the winnings returned to players on those wagers (before paying operating costs).

**R. Reserved**

**S. Sports Integrity**

(a) Licensees shall adopt approved internal controls to identify suspicious wagers which may indicate cheating, manipulation, interference with the regular conduct of sport, or violations of the integrity of any sport on which wagers were made.

(b) Licensees shall file as soon as reasonably possible, but in no case more than twelve (12) hours, an integrity alert report detailing the suspicious activity to the LTBB Gaming Regulatory Commission, or his designee, on forms provided by the LTBB Gaming Regulatory Commission.

(c) If the LTBB Gaming Regulatory Commission deems the threat credible, it may send the alert to other licensees and may suspend betting or require that wagers be voided on the event(s).

(d) If a Licensee receives notice of suspicious activity at another property, they must respond within twelve (12) hours to confirm or deny similar betting trends and activity.

(e) In the event of generating or receiving an alert, the licensees affected shall maintain all relevant information regarding the bet and the bettor.

(f) Information contained in alerts may be shared with law enforcement, sports leagues, or other entities as deemed necessary by the LTBB Gaming Regulatory Commission to maintain the integrity of wagering.

(g) The LTBB Gaming Regulatory Commission may impose any additional conditions reasonably necessary on a licensee to address risks to the integrity of sport and sports betting.

CERTIFICATION

As Chairperson, I approve these Gaming Regulatory Sports Betting Regulations.

Date: 8-31-20 Regina Gasco Bentley  
Regina Gasco Bentley, Tribal Chairperson

Received by the Tribal Council Office on: 08.31.2020 by: Pinde Rokee

As the Legislative Leader and Tribal Council Secretary, we certify that were approved by the Tribal Council approved REG- WOS 2011-005 081820-001 of the Little Traverse Bay Bands of Odawa Indians at a regular meeting of the Tribal Council held on September 3, 2020 at which a quorum was present, by a vote of 8 in favor, 0 opposed, 1 abstentions, and 0 absent.

Date: 09/03/2020 Emily Proctor  
Emily Proctor, Legislative Leader

Date: 09/03/2020 Julie Shanavaquet  
Julie Shanavaquet, Secretary

