

Santa Clara Pueblo Gaming Commission



Bribes, Kickbacks and Vendor Gifts

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CHAPTER IV – GENERAL PROVISIONS

SECTION 29: BRIBES, KICKBACKS AND VENDOR GIFTS

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CHAPTER V – GENERAL PROVISIONS

SECTION 29: BRIBES, KICKBACKS AND VENDOR GIFTS

29.1 Purpose. The purpose of these regulations is to require for the Commission to adopt and enforce procedures, to ensure the honesty, integrity, security, and fairness of the gaming operation is not compromised by the offer of, or the acceptance of any bribes, kickbacks, or vendor gifts to any employee of the gaming operation, for the conduct of Class III Gaming that are in compliance with the Tribal/State Compact approved on October 23, 2015.

29.2 Authority. The Commission has authority to regulate and to promulgate and enact regulations pursuant to delegated authority from the Santa Clara Pueblo Tribal Council and the Santa Clara Pueblo Gaming Code. The Commission has the responsibility under the Gaming Code to enforce all policies and procedures for prohibition of the offer of, or the acceptance of any bribes, kickbacks, or vendor gifts applicable to the gaming operation. The Commission also has the authority to issue regulations, not inconsistent with the Gaming Code, the Compact, and IGRA, to govern the operation and management of each gaming operation and gaming facility. The Commission shall work with each gaming enterprise or management contractor to establish policies and procedures for prohibition of the offer of, or the acceptance of any bribes, kickbacks, or vendor gifts applicable to the gaming operation and/or occurring on the gaming premises.

29.3 General.

(1) Under no circumstances shall any employee accept a bribe, kickback, or vendor gift. Any employee who receives such an offer shall report this to their supervisor who shall then report the incident to the Gaming Manager, Compliance Department, and the Commission. Any items received shall be turned in to the Public Safety Department to be maintained in a secure area until the incident can be reviewed by the Gaming Manager, Compliance Department, and the Commission.

(2) With the limited exception of employees of the gaming operation who are authorized to accept tips from patrons, employees are prohibited from accepting personal favors, gifts or other forms of compensation from any person or organization, doing business or wishing to do business with the gaming operation relating to gaming; or from any person wishing to obtain an unfair advantage in any authorized gaming activity. However, an employee may accept such items if there is no likelihood of improper influence or the appearance of improper influence and if the item is one of the following:

- (a) A non-cash gift of nominal value (\$25.00) such as received at holidays, events, or special occasions.
- (b) A non-cash gift available to the general public, with prior approval from the gaming manager.
- (c) Awards for recognition of service and accomplishment.
- (d) Acceptance of meals of nominal value (\$25.00) with prior approval from the gaming manager.

(3) Employees are prohibited from soliciting or accepting anything of value from anyone in return for any business, service or confidential gaming operation, or Commission information. Employees are likewise prohibited from using their position with the gaming operation or Commission to obtain any items or benefits not otherwise available to the general public.

29.4 Employee Training. Each gaming enterprise shall see that all of its applicable employees are fully trained in the requirements of these regulations pertaining to the prohibition of the offer of, or the acceptance of any bribes, kickbacks, or vendor gifts applicable to the gaming operation and/or occurring on the gaming premises. Such training shall be updated regularly by the gaming enterprise.

29.5 Role of the Commission. The Commission shall ensure the gaming enterprise has procedures established to administer, monitor and ensure compliance with this regulation.