

## **Seminole Tribal Gaming Commission Vendor Registration Program**

The Seminole Tribal Gaming Code (“Code”) provides for the licensing of suppliers of goods and services to the Seminole Tribe of Florida’s (“Tribe”) gaming facilities and compliance with the Gaming Vendor Registration Program (“Program”). The Seminole Tribal Gaming Commission (“Commission”) is empowered by the Code to promulgate regulations and policies as may be necessary to implement, administer, and enforce the Code. This includes promulgating administrative regulations and policies regarding licensing suppliers providing goods and services to gaming facilities licensed under the Code.

### **Introduction**

The Tribe is engaged in Tribal Government Gaming in accordance with the Indian Gaming Regulatory Act and the regulations promulgated by the National Indian Gaming Commission. As a result, the Tribe cannot engage in significant transactions with individuals or business entities that, because of past or continuing activities, associations or reputation, might bring discredit to the Tribe and its gaming operations. Thus, the Tribe has adopted a program whereby it will continually review significant transactions involving its gaming activities and the persons or entities involved with those transactions to ensure compliance with all applicable laws and regulations pertinent to gaming.

If any employee from Seminole Gaming or any of the Tribe's gaming facilities performs their duties and/or responsibilities in a manner to intentionally circumvent the requirements of this program, their actions will be reported to the Commission. Depending on the severity of their actions, the Commission may suspend or revoke their Gaming License or Seminole Tribal Work Permit, which could ultimately result in their termination.

### **Vendor Registration Program: General**

1. Suppliers of goods and services to the gaming facilities must comply with the Vendor Registration Program requirements unless the individual or company meets the exemption requirements as prescribed in STGC Policy Gaming Vendor Registration Program Gaming Vendor Exemptions from Gaming Vendor-Licensing Requirements and Delegation of Authority to the Executive Director to Grant Gaming Vendor Exemptions. The Commission also may adopt special procedures for issuing a temporary License to a supplier to provide goods and/or services on a limited one-time basis. In addition, the Commission is authorized to make special accommodations for licensing and access in the case of a supplier of goods and services that is wholly owned by the Tribe.
2. Suppliers of goods and services to the gaming facilities shall apply for and obtain a vendor license from the Commission.
3. Seminole Gaming will not authorize payment to a vendor unless the Commission completes their background investigation and issues the vendor a gaming vendor license.

## **Vendor Registration Application**

1. All Suppliers of goods and services to the gaming facilities must submit a Vendor Registration Application.
2. The Vendor Registration Application must request the following unless exempt:
  - a) The company name, address and telephone number, e-mail address and FIN/Tax ID;
  - b) DBA and if applicable, Publicly Traded Information;
  - c) Principal information to include name, title, social security number (foreign nationals to provide country issued ID #), date of birth and ownership percentage;
  - d) Criminal, judgments and litigation information on principals and company;
  - e) Licensing, Permit and Regulatory;
  - f) Any other information deemed necessary by the Executive Director or the Commission.

## **Background Investigation**

1. The information requested on the Vendor Registration Application will be used by the Commission to determine Vendor License Suitability.
2. Background screenings will be conducted on the company and principal(s). Screenings will consist but are not limited to criminal, public record, financial and media searches.
3. Omissions and or false statements on any part of the application will be grounds for denying a license.
4. Significant derogatory information, felony convictions, habitual offenses regardless of level may result in license denial.

## **Appeals**

In cases where a vendor is denied (not issued a gaming vendor license), the vendor may submit a written appeal request to the Executive Director of the Commission. The Executive Director will review the background investigation, make a determination and notify the requesting vendor in writing as to his/her decision. Appeal decisions are considered final.

## **Terms of License**

1. Applicants and licensees shall have a continuing duty to provide any materials, assistance or other information required by the Commission, and to fully cooperate in any investigation conducted by or on behalf of the Commission.
2. The Commission shall be notified immediately of any items or events of non-compliance.
3. Exemptions from the gaming vendor-licensing requirements are valid for one year from the date of issuance.
4. The Commission shall have the right to suspend, revoke, restrict or place conditions on any vendor license for violation of any applicable Tribal rules or regulations, Tribal Ordinances or Resolutions. The Commission may apply civil fines as outlined in the Seminole Tribal Gaming Commission Regulations.

## **Gaming Vendor License**

1. All gaming vendors, including those receiving exemptions from the gaming vendor-licensing requirements will be issued a gaming vendor license. A gaming facility licensee cannot obtain gaming-related goods or services from a gaming vendor, unless the gaming vendor has an active gaming vendor license or is exempt.
2. Seminole Gaming must supply the Commission with quarterly updates on active, deactivated and non-qualified vendors.
3. The Commission will terminate the gaming vendor license of all inactive vendors. All inactive vendors must reapply for a gaming vendor license or exemption.
4. The Commission will terminate the gaming vendor license of vendors exceeding ninety (90) calendar days in non-qualified vendor status.