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CHEROKEE NATION GAMING COMMISSION
RULES AND REGULATIONS

CHAPTER:	Administration	CHAPTER #:	II
SUBJECT:	Individual Licensee Code of Conduct	SECTION –SUBSECTION:	B – 8
EFFECTIVE DATE:		SUPERSEDES MATERIAL DATED:	
APPROVED BY:		DATE:	

PURPOSE

The code of conduct regulation is intended to provide expectations, guidance, and rules to all applicants for and holders of a Cherokee Nation Gaming Commission (CNGC) gaming license.

This document establishes the standards of fairness and integrity for all licensees of the CNGC while conducting business on behalf of the casino or while representing the Cherokee Nation (Nation); to be in accord with and sensitive to the approved standards of behavior in legal, social, or professional codes of conduct.

SCOPE

This Section applies to CNGC Commissioners, CNGC employees, CNE employees, and individually licensed vendor representatives.

The requirements of this Section are in addition to those contained in CNGC Regulation Chapter II (B) (2) – Ethics.

POLICY

All persons applying for a gaming license as well as those who have been granted the privilege of receiving a CNGC gaming license are expected to conduct themselves in a manner that reflects positively on the Nation. It is the policy of the CNGC to recognize that licensees hold positions of trust on behalf of the CNGC and must endeavor to exercise the highest qualities of conduct, honesty and integrity. It is the responsibility of each individual licensee to ensure that his/her conduct is free from corruption, compromise, undue influence, conflicts of interest, and any actual or perceived acts of undesirable or unethical conduct. This regulation shall attempt to identify conduct or relationships which are deemed appropriate and those deemed unacceptable.



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A. RESPONSIBILITIES

1. Each recipient of a CNGC gaming license is responsible for reading, understanding, and following the standards outlined within this document.
2. Each recipient of a CNGC gaming license is responsible for reporting violations of this policy to their appropriate management.
3. The CNGC shall be responsible for enforcing violations of this policy as defined within this document.

B. STANDARDS

1. The following are examples of unacceptable behavior that could affect a person’s suitability to obtain and/or maintain a CNGC gaming license:
 - a. Any theft from patrons, casino employee(s), co-worker(s), the Nation, the casino(s), or convictions of any crime of theft or moral turpitude.
 - b. Intimidating or threatening licensees or patrons;
 - c. Accessing locations, events, data, or records without need or as duly authorized as part of appointed job responsibilities.
 - d. Any willful or negligent damage to Nation, casino, and/or patron assets or property.
 - e. Unjustified assault of any licensee or patron, at any time.
 - f. Unauthorized possession of firearms, explosives, or other weapons on Cherokee lands.



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- g. Failure or refusal to report any suspected or known violations of any law (tribal/state/federal), compact requirements, or CNGC regulations.
- h. Failure or refusal to cooperate with the CNGC or other regulatory or law enforcement agency in any investigation.
- i. Willful falsification or alteration of a CNGC or casino record, report, or other document, inclusive of Surveillance recordings and other electronic records, that compromises gaming activity, financial accountability or the integrity of the casino.
- j. No licensee shall accept either directly or indirectly any gift, reward, incentive merchandise, cash, or anything of value from any business, owner, and/or employee of a business doing or wishing to do business with the casinos.
- k. No licensee that is eligible to and receives a tip or gratuity from a patron shall fail to properly report such tip or gratuity.
- l. No licensee shall have unescorted, unattended access to cash belonging to the casino unless specifically authorized by the CNGC.
- m. No licensee shall engage, either directly or indirectly, in any gaming activity at any Cherokee casino unless authorized by the CNGC.
- n. No licensee shall commit any violation of the gaming ordinance or other gaming regulations.
- o. No licensee shall associate, professionally or socially, with any person(s), entity(s), or organization(s) known to have the reputation of criminal or undesirable character, or, in any manner whatsoever maintain any association which would endanger the integrity or reputation of the casino or the Nation, or which could be construed and/or perceived as a conflict of interest.



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2. CNGC licensees shall, at all times, conduct themselves in a highly professional and ethical manner and shall not engage in any of the following:
 - a. Utilization of language and/or demonstration of behavior, which could be deemed inappropriate, improper, offensive, hazardous or damaging to any person or property.
 - b. Abusive, disrespectful, gender or racial specific exchanges with casino patrons, managers, or licensees.
 - c. Misuse, abuse or waste of Nation and/or casino assets and/or resources.
 - d. Any language or activity which could be construed as offensive to the same or opposite sex, or of a sexual or gender specific nature, or could be construed as sexual harassment and/or creating a threatening, hostile, or offensive work environment.
 - e. Any other conduct not listed which would bring embarrassment or disrespect to the casino or the Nation or otherwise bring the honesty, integrity and respect of the casino or the Nation into question.
 - f. No licensee shall divulge, convey, distribute or disseminate any information, data, records, documents, correspondence or any other information, whether verbal or otherwise, to anyone outside of their chain-of-command or the CNGC regarding casino activities or disclosures that would violate the privacy of a licensee. Exceptions to this would include sharing information with legitimate regulatory or law enforcement agencies.

C. VIOLATIONS AND DISCIPLINE

1. CNGC licensees shall always be held to the highest standards of professional and personal conduct. They are expected to set an example for honesty, integrity professionalism, and ethical behavior, which is beyond reproach.



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2. Violations of any of the standards set forth in this policy shall result in disciplinary action up to and including license suspension and/or revocation, which could result in termination of employment.

D. PROFESSIONAL ETHICAL STANDARDS

1. Nothing in this document is intended to modify or replace any standard of conduct required for obtaining and maintaining any professional certification or license (e.g. CPA, CIA, CFE); licensees are expected to follow the requirements set forth by the entity granting professional certification as well as any specific professional standards required by his/her department. Any conflict between this regulation and any professional ethical standard and/or code of conduct shall be brought to the attention of the licensee’s supervisor and the CNGC Director immediately upon determination.
2. Further, all licensees belonging to a professional organization are expected to adhere to the guidelines imposed by that organization, in addition to those contained in this regulation.
3. For any conflict between this document and any professional standard, code, or rule, the more stringent rule shall apply.