

## **Fundamentals of Tribal Casino Gaming Regulation – A Primer for Regulators**

### **Top 10 Considerations for Tribal Gaming Regulatory Agencies Regarding Report Writing**

Nearly every action and process undertaken by TGRA personnel will be memorialized in a prepared report. TGRA reports guide decision-making, serve as the basis for criminal prosecution, civil action, regulatory determination, licensing, resource allocation, and memorialize the actions of regulatory personnel. The following ten considerations distill the most important priorities for TGRA report writing composition.

#### **1. Maintain Regulatory Objectivity**

**Why it matters:** TGRA reports become legal records used in enforcement actions, licensing decisions, and court proceedings.

##### **Key practices**

- Separate facts, analysis, and opinions
- Cite evidence supporting conclusions
- Avoid emotional or accusatory language
- Explicitly identify expert opinions

#### **2. Document Sources and Evidence Rigorously**

**Why it matters:** Regulatory credibility depends on verifiable documentation.

##### **Key practices**

- Identify source of every material fact
- Include interviewee name/title/date/time/contact information
- Reference surveillance logs, system reports, or documents
- Attach exhibits or appendices

##### **Example sources**

- Surveillance video ID numbers
- Player tracking reports
- Witness statements
- Audit workpapers

### **3. Capture the “Who, What, When, Where, How, and Why”**

Every TGRA report must answer the investigative fundamentals.

#### **Checklist**

- Who performed the action
- What occurred
- When it happened
- Where it occurred
- How it was detected
- Relevance to regulation or policy

### **4. Write Chronologically and Logically**

Regulatory narratives must reconstruct events clearly.

#### **Use**

- Chronological sequence for investigations
- Inverted pyramid for executive summaries
- Logical grouping for audit findings

This prevents ambiguity and misinterpretation.

### **5. Be Complete Without Being Verbose**

Insufficient detail undermines enforcement; excessive narrative obscures facts.

#### **Include**

- Material facts
- Regulatory citations
- Impact assessment

#### **Avoid**

- Redundant wording
- Irrelevant background
- Unsupported speculation

A regulator's report is an analytical document—not a story.

## **6. Use Clear, Professional Language**

Poor grammar or sloppy writing weakens credibility.

### **Standards**

- Active voice preferred
- Correct grammar, punctuation, and spelling
- Consistent terminology

Use regulatory terminology precisely:

- “Violation of Ordinance §\_\_”
- “Non-compliance with MICS”
- “Insufficient internal control”

## **7. Protect Confidential and Sensitive Information**

TGRA reports often contain:

- Criminal history information
- Patron financial data
- Surveillance findings
- Licensing suitability details

### **Controls**

- Redact personal identifiers where required
- Follow data retention policies
- Restrict distribution

## **8. Connect Findings to Regulations and Internal Controls**

A report should never state a violation without citing authority.

### **Always include**

- Tribal gaming ordinance citation

- TGRA regulation citation
- MICS/TICS reference
- Compact provision if applicable

## **9. Provide Clear Conclusions and Recommended Actions**

TGRA reports drive decisions.

Each report should include:

- Findings summary
- Risk assessment
- Recommended corrective actions
- Deadlines and responsible parties

Examples:

- Issue Notice of Violation
- Require internal control amendment
- Impose civil fine or other sanction
- Refer for licensing review

## **10. Follow a Structured Writing Workflow**

Professional TGRA reports follow disciplined process:

1. Plan outline
2. Draft narrative
3. Technical review
4. Legal/regulatory review
5. Proofread
6. Final approval

This reduces errors and ensures consistency across TGRA departments.

### **Common TGRA Report Errors to Avoid:**

- Missing source attribution
- Insufficient detail
- Disorganized structure

- Poor grammar/punctuation
- Subjective conclusions

## Suggested TGRA Report Template Structure:

1. Executive Summary
2. Scope and Authority
3. Methodology
4. Findings
5. Analysis
6. Regulatory Citations
7. Conclusions
8. Corrective Actions
9. Appendices/Exhibits

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