



COMMONWEALTH CASINO COMMISSION
Commonwealth of the Northern Mariana Islands
Unit 13 & 14, Springs Plaza, Chalan Pale Arnold, Gualo Rai
P.O. Box 500237, Saipan, MP 96950
Telephone: +1 (670) 233-1857/58
Facsimile: +1 (670) 233-1856
E-mail: info@cnmicasinocommission.com



Juan M. Sablan, Chairman
Joseph C. Reyes, Vice Chairman
Alvaro A. Santos, Secretary/Treasurer
Ramon M. Dela Cruz, Commissioner

COMMISSION ORDER NO: 2018-002

Order Designating In-House Counsel as Casino Key Employees Requiring Licensure

For good cause determined at the June 28, 2018 public meeting of the Commonwealth Casino Commission, which was duly publicly noticed, and based on the authority granted by the laws of the Commonwealth (including but not limited to Public Laws 18-56 and 19-24) and the Regulations of the Commonwealth Casino Commission, NMIAC Chapter 175-10.1, the Commonwealth Casino Commission hereby finds and **ORDERS AS FOLLOWS:**

1. WHEREAS, Regulation §175-10.1-040(q)(3), in pertinent part, defines "casino key employees" as "Any employee whatsoever of a casino licensee so designated by the Commission"; and
2. WHEREAS, due to the sensitive and important nature of the work normally provided by in-house counsel generally, and specifically the work provided by the counsel employed by the casino licensee of which the Commission is aware, the Commission has determined that it is beneficial to expand the definition of "casino key employee" to include in-house counsel; and
3. WHEREAS, this designation requires all in-house counsel of the casino licensee to apply for and receive licensure as a casino key employee pursuant to §175-10.1-1905; NOW, THEREFORE,
4. IT IS HEREBY ORDERED that all in-house counsel employed by the casino licensee are designated as casino key employees subject to licensure as a casino key employee; and,
5. IT IS HEREBY ORDERED that this Order applies to all in-house counsel employed by the casino licensee without regard to the counsel's job title or whether the counsel supervises other employees; and

6. IT IS HEREBY FURTHER ORDERED all in-house counsel hired after the date this Order takes effect must apply for and receive licensure, provisional or otherwise, as a casino key employee prior to beginning employment with the casino licensee; and

7. IT IS HEREBY FURTHER ORDERED that all in-house counsel employed by the casino licensee prior to the date this Order takes effect shall have sixty (60) days to apply for and receive licensure, be it provisional or otherwise, as a casino key employee if such counsel has not yet received licensure as a casino key employee; and

8. IT IS HEREBY FURTHER ORDERED that the Chairman or the Executive Director shall take steps necessary to ensure that this Order is published in the Commonwealth Register; and

8. IT IS HEREBY FURTHER ORDERED that this Order is to take effect immediately, or the earliest other time prescribed by law, and shall remain in effect until it is repealed or replaced by subsequent Order of the Commission.

SO ORDERED this 28th day of June, 2018.

Signature: _____

A handwritten signature in black ink, appearing to read 'Joan M. Sablan', is written over a horizontal line. The signature is stylized with a large loop at the beginning and a long, sweeping stroke at the end.

JOAN M. SABLAN
CHAIRMAN